IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

I. STEPHEN RABIN, on behalf of himself and CIVIL ACTION all others similarly situated,

NO. 2:15-CV-00551-GAM

Plaintiff.

CLASS ACTION

v.

TRIAL BY JURY DEMANDED

NASDAQ OMX PHLX LLC, NASDAQ OMX GROUP, INC., BEDROCK TRADING LTD, BLUEFIN TRADING, LLC, CONSOLIDATED TRADING LLC, ELM TRADING, L.P., FIRST DERIVATIVE TRADERS, LP, HAP TRADING, L.L.C., KEYSTONE TRADING PARTNERS, LLC, LARGO TRADING, L.P., SUMMIT SECURITIES GROUP, LLC, SUMO CAPITAL, LLC, SUSQUEHANNA INTERNATIONAL GROUP, LLP, SIG HOLDING LLC, MICHAEL PATRICK DOHERTY, ALAN BARRY GOLDBERG, ROBERT CHRISTOPHER SACK, BRIAN PATRICK SULLIVAN, TSR ASSOCIATES, L.L.C. and V TRADER-CG, LLC,

Defendants.

AMENDED COMPLAINT

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Plaintiff, I. Stephen Rabin ("Rabin" or "Plaintiff"), individually and on behalf of all other persons similarly situated, alleges the following upon information and belief based upon, *inter alia*, the investigation made with his attorneys, except for those allegations regarding his personal trading which is made on personal knowledge.

I. SUMMARY OF THE CASE

1. This is a class action on behalf of all persons who suffered damages when certain market makers¹ and conspiring broker-dealers on the options market of NASDAQ OMX PHLX ("PHLX Exchange") manipulated certain options in advance of dividend payments on underlying stock and exchange traded funds ("ETFs") for their personal benefit to the detriment of other options investors during the Class Period.² Specifically, the market maker and conspiring broker-dealers defendants identified below ("Market Maker Defendants") damaged other writers of call options by executing among themselves huge pre-arranged manipulative matched options trades on an underlying security immediately prior to the date for that security's dividend payment. The result is that the Market Maker Defendants materially increased the likelihood that such defendants would obtain, and did improperly obtain, dividends that would have been paid to Plaintiff and the other members of the Class. The Market Maker Defendants have improperly used their privileged regulatory status as market makers (including exemptions

A market maker is "a dealer who, with respect to a particular security, (i) regularly publishes bona fide, competitive bid and offer quotations in a recognized interdealer quotation system; or (ii) furnishes bona fide competitive bid and offer quotations on request; and, (iii) is ready, willing and able to effect transactions in reasonable quantities at his quoted prices with other brokers or dealers." Exchange Act Rule 15c3-1(c)(8), 17 C.F.R. § 240.15c3-1(c)(8).

As defined herein, the proposed Class and the Class Period is: all persons who held short positions on "in the money" call options contracts on dividend paying stocks and exchange traded funds ("ETFs") and who were adversely affected by Defendants' conspiracy to manipulate, and manipulation of the options markets prior to the ex-dividend date on such securities from February 6, 2010 through the present (the "Class Period"). Excluded from the Class are Defendants, members of their immediate families and their legal representatives, parents, affiliates, heirs, successors or assigns and any entity in which Defendants have or have had a controlling interest (the "Excluded Persons"). Also excluded are any officers, directors, or trustees of the Excluded Persons.

from certain credit limits) to make these manipulative trades (which are outside their proper market function). In short, these Market Maker Defendants have diverted the dividend payments to themselves from other writers of call options by manipulating the options clearing system.³ During the Class Period, the actions of the Market Maker Defendants and other Defendants (identified below) have already damaged options investors by hundreds of millions of dollars.

- 2. As alleged in detail below, Plaintiff was injured as a result of Market Maker Defendants' manipulation of the options contracts in Pfizer, Inc. ("Pfizer" or "PFE") during the Class Period. Plaintiff alleges details of Market Maker Defendants' manipulation of options contracts in Pfizer. The Market Maker Defendants inflated the size of the options open interest pool for Pfizer stock by flooding the market with over a million additional option contracts one day before the ex-dividend date of PFE common stock. The result of this manipulation was to ensure that the bulk of PFE dividend payments would be directed to the Market Maker Defendants rather than to Plaintiff and the other Class members. These trades added almost no risk for the Market Maker Defendants.
- 3. Market Maker Defendants have engaged in similar manipulative activities with regard to options on other dividend paying stocks and ETFs during the Class Period at the PHLX Exchange.
- 4. Plaintiff's remedies arise under the Securities Exchange Act of 1934 (the "Exchange Act") and state law.

II. <u>JURISDICTION AND VENUE</u>

5. Plaintiff I. Stephen Rabin ("Mr. Rabin" or "Plaintiff") brings this action pursuant to Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78j(b), as well as Rule 10b-5(a) and (c), 17 C.F.R. § 240.10b-5(a) and (c), promulgated

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A description of "writers" of call options is more fully set forth in Section IV.A. below.

thereunder. Options contracts, including the options at issue here, are securities registered with the Securities and Exchange Commission ("SEC") and can only be traded on a securities exchange under the jurisdiction of the SEC.

- 6. In connection with the acts alleged in this complaint, the Defendants, directly or indirectly, used the means and instrumentalities of interstate commerce, and the facilities of a national securities exchange.
- 7. This Court has jurisdiction of this action pursuant to Section 27 of the Exchange Act, 15 U.S.C. § 78aa, and 28 U.S.C. § 1331, and the provisions of the federal securities laws identified above. This Court also has supplemental jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1367.
- 8. At the time of the wrongs alleged herein, Mr. Rabin transacted business in this district. During the Class Period, Plaintiff's purchases and sales of the relevant options occurred in this district. Prospective witnesses reside in and/or can be found in this district. Venue is thus proper in this district pursuant to Section 27 of the Exchange Act and 28 U.S.C. §§ 1391(b) and 1391(c).

III. <u>PARTIES</u>

- 9. Plaintiff I. Stephen Rabin is an individual who resides in New York. As detailed in its Certification attached hereto as Exhibit A, Plaintiff had short positions⁴ on options contracts during the Class Period, and as a result thereof, suffered damages from Defendants' unlawful conduct alleged herein.
- 10. Market Maker Defendants are market makers who participate in the options market of the PHLX Exchange, with an obligation to provide liquidity in the market, but who conspired to engage in, and engaged in, the wrongs detailed herein. Market Maker Defendants

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A description of "short positions" is more fully set forth in Section IV.A. below.

include those market makers and other broker-dealers who improperly traded in the Pfizer option contracts of the same series as the Plaintiff, as described herein. The PFE manipulative trading incidents resulted in injury to Plaintiff, and is only one example of a pattern of trades engaged in by Defendants for the purpose of wrongfully conspiring to capture, and capturing, the dividend payments on unexercised call options. Exhibit B to this complaint – titled "Ongoing and Massive Trading Manipulation for a Typical Quarter (2014 Q3)" – provides three months of instances of manipulated call options as evidenced by the ballooned trading pattern immediately prior to a security's ex-dividend date. ⁵ See attached Exhibit B. The records of Defendant NASDAQ/PHLX revealed the names of the market makers who conspired to engage in, and engaged in, this improper practice during the relevant period in stocks or ETFs going exdividend. Market Maker Defendants who wrote more than 700,000,000 contracts of the 789,381,178 call options written in this scheme during the Class Period were the principal participants of this fraudulent scheme and conspiracy.

- 11. Defendant Bedrock Trading Ltd ("Bedrock") is a Pennsylvania limited partnership having an address at 19 Bryn Mawr Ave., Bala Cynwyd, PA 19004. Bedrock is a market maker on the PHLX Exchange who wrote 88,646,571 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 12. Defendant Bluefin Trading, LLC ("Bluefin") is a New York limited liability company having an address at 3 Park Avenue, 37th Fl., New York, NY 10016. Bluefin is a market maker on the PHLX Exchange who wrote 7,780,102 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.

The ex-dividend date refers to the timing of entitlement to the payment of dividends on a security. If an investor purchases a stock on its ex-dividend date or after, he will not receive the next dividend payment. Instead, the seller gets the dividend. If an investor purchases before the ex-dividend date, he gets the dividend.

- 13. Defendant Consolidated Trading LLC ("Consolidated") is an Illinois limited liability company having an address at 200 W Jackson Blvd., Ste. 2300, Chicago, IL 60606. Consolidated is a market maker on the PHLX Exchange who wrote 60,106,008 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 14. Defendant ELM Trading, L.P. ("ELM") is a Pennsylvania limited partnership having an address at 1900 Market St., Ste. 705, Philadelphia, PA 19103. ELM is a market maker on the PHLX Exchange who wrote 70,102,794 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 15. Defendant First Derivative Traders, L.P. ("First Derivative") is a Pennsylvania limited partnership having an address at 419 Minden Way, Wynnewood, PA 19096. First Derivative is a market maker on the PHLX Exchange who wrote 87,519,180 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 16. Defendant HAP Trading, LLC ("HAP") is a New York limited liability company having an address at 33 Whitehall St., 6th Fl., New York, NY 10004. HAP is a broker-dealer on the PHLX Exchange who wrote 13,087,239 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 17. Defendant Keystone Trading Partners, LLC ("Keystone") is a Pennsylvania limited liability company having an address at 660 Narcisi Ln., Wayne, PA 19018. Keystone is a market maker on the PHLX Exchange who wrote 75,697,284 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.

- 18. Defendant Largo Trading, L.P. ("Largo") is a Pennsylvania limited partnership having an address at 361 North Highland Ave, Merion Station, PA 19066. Largo is a market maker on the PHLX Exchange who wrote 88,836,075 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 19. Defendant Summit Securities Group, LLC ("Summit") is a Delaware limited liability company having an address at 140 Broadway, 46th Fl., New York, NY 10005. Summit is a broker-dealer engaged in activity on the PHLX Exchange who wrote 7,831,442 call options as Summit and 14,308,717 call options under its predecessor, White Bay PT LLC, during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 20. Defendant Sumo Capital LLC ("Sumo") is an Illinois limited liability company having an address at 440 S. LaSalle Street, Ste. 2101, Chicago, IL 60605. Sumo is a market maker on the PHLX Exchange who wrote 7,315,750 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 21. Defendants Susquehanna International Group, LLP, a Delaware limited liability partnership having an address of 1201 N. Orange St., Ste. 715, New Castle, DE; SIG Holding LLC, a Pennsylvania limited liability company having an address of 401 City Ave., Ste. 220, Bala Cynwyd, PA 19004; Michael Patrick Doherty, having an address of 401 City Ave., Ste. 220, Bala Cynwyd, PA 19004; Alan Barry Goldberg, having an address of 401 City Ave., Ste. 220, Bala Cynwyd, PA 19004; Robert Christopher Sack, having an address of 401 City Ave., Ste. 220, Bala Cynwyd, PA 19004 and Brian Patrick Sullivan, having an address of 401 City Ave., Ste. 220, Bala Cynwyd, PA 19004 (collectively "Susquehanna") conduct business in Pennsylvania under the fictitious name Susquehanna Securities at the address 401 City Ave., Ste. 220, Bala Cynwyd, PA 19004. Susquehanna is a market maker on the PHLX Exchange who

wrote 34,657,232 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.

- 22. Defendant TSR Associates, L.L.C. ("TSR") is a Pennsylvania limited liability company having an address at 10 West Mermaid Lane, Philadelphia PA 19118. TSR is a broker-dealer engaged in activity on the PHLX Exchange who wrote 43,529,645 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 23. Defendant V Trader-CG, LLC, trading as V Trader Pro, LLC ("V Trader") is a Pennsylvania limited liability corporation having an address at 1818 Market Street, 18th Fl., Philadelphia, PA 19103. V Trader is a broker-dealer engaged in activity on the PHLX Exchange who wrote 158,747,261 call options during the Class Period identified on the records of Defendant NASDAQ/PHLX as dividend rebate strategy trades.
- 24. Defendant NASDAQ OMX PHLX LLC ("NASDAQ/PHLX") is a limited liability company organized under the laws of the State of Delaware. NASDAQ/PHLX is a Self-Regulatory Organization ("SRO"), which owns and operates the PHLX Exchange. The PHLX Exchange focuses on options trading, trading more than 3,000 classes of equity options.
- 25. Defendant The NASDAQ OMX Group Inc. ("NASDAQ OMX") is a Delaware corporation that is the parent of NASDAQ/PHLX. NASDAQ OMX is a for-profit entity. NASDAQ OMX is not itself a securities exchange, but owns and operates several securities exchanges, including the PHLX Exchange through its subsidiary NASDAQ/PHLX.
- 26. The "Market Maker Defendants," together with Defendant "NASDAQ/PHLX" and Defendant "NASDAQ OMX" are collectively "Defendants" herein.
- 27. Identification of the specific Market Maker Defendants who participated in this conspiracy was accomplished by discovery at the outset of the case from the NASDAQ/PHLX.

NASDAQ/PHLX maintains records that identified each party to options trades and specifically asks option writers to code any trade that is executed in conjunction with any dividend rebate strategy. The Options Clearing Corporation ("OCC") also possesses such records of parties to option trades. Review of such trading information from NASDAQ/PHLX allowed Plaintiff to identify the Market Maker Defendants who conspired to manipulate, and who manipulated, trading in the relevant options, aimed at capturing the dividend payments from unexercised call options during the Class Period. This discovery also identifies which call options were manipulated.

IV. BACKGROUND ON TRADING OPTIONS RELATED TO THE MANIPULATION

A. Option Trading Practices

- 28. A listed option is a security guaranteed by the OCC. An option is a contract to buy or sell a specific underlying security. The options guaranteed by the OCC are traded on multiple securities exchanges in the United States, including the PHLX. Options trading activity is regulated by the SEC.
- 29. The predominant form of options that trade on the options exchanges in the United States are "American-style" options, which means that the options can be exercised at any time prior to their expiration.
- 30. In addition to guaranteeing options, the OCC serves as the clearing agent and intermediary of options transactions. By taking the counterparty side in each purchase and sale transaction respectively, the OCC ensures performance between buyers and sellers, and ensures that obligations of the options contracts are fulfilled.
 - 31. Each option contract normally represents 100 shares of the underlying security.
- 32. A "call" is an option that gives the holder (the "buyer") the right, but not the obligation, to buy 100 shares of the underlying security (*i.e.*, to "call" or "assign" it away from

the current owner) at a specified price (the "strike price") for the period of time beginning on the purchase date and ending on the expiration of the option (the "expiration date"). The seller of a call option, known as the "writer," is obligated to sell the underlying security to the buyer should the buyer so elect. When a holder of a call chooses to buy the security through the option contract, their election to buy is called an "exercise" of the option contract. When the seller of a call option is obligated to sell the underlying security through the option contract, such an obligatory sale is termed an "assignment." The seller is the "assigned party."

33. Buyers of call options are known as taking a "long" position, in the options and sellers of options are known as taking a "short" position. As stated by the OCC in its publication "Characteristics and Risks of Standardized Options":

Long position: A position wherein an investor's interest in a particular series of options is as a net holder (*i.e.*, the number of contracts bought exceeds the number of contracts sold).

Short position: A position wherein a person's interest in a particular series of options is as a net writer (*i.e.*, the number of contracts sold exceeds the number of contracts bought).

- 34. In purchasing a call option (taking a long position) a purchaser pays a "premium," *i.e.*, the price for the option. Premiums are set in the market, plus any commissions and transaction costs. The seller of the option, in turn, receives the premium (less any commissions and transaction costs) in exchange for his selling or "writing" of the option.
- 35. Logically, the holder of a call option will only exercise the option if it is "in the money." A call option is considered to be "in the money" if the underlying security's trading price is higher than the call strike price. If the trading price of the underlying security is below the specified strike price, then the call option would be "out of the money."
- 36. By way of further background, the chart below summarizes the differences between long and short positions in calls.

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B. Summary of Terms Relating to Long and Short Call Options

	CALL		
LONG	1.	Buying a call is taking a long position.	
	2.	Buyer pays a premium.	
	3.	Buyer hopes the value of the call increases as the value of the underlying security goes up.	
	4.	If the value of the security goes up, buyer exercises the call and buys the security at the strike price or buyer sells his call at a profit.	
	5.	If the value of the security goes down, the most buyer loses is the premium paid (<i>i.e.</i> , limited to loss exposure).	
SHORT	1.	Writing or selling is taking a short position.	
	2.	Writer is paid a premium.	
	3.	Writer hopes the value of the security does not change or goes down.	
	4.	If price does not go above the strike price, writer keeps premium as option expires worthless.	
	5a.	If price goes up and the option writer owns the underlying security (known as a "covered call writing") and his option is assigned, then he is paid the strike price for his security. He keeps both the premium and security payment.	
	5b.	If price goes up and the writer does not own the security (<i>i.e.</i> , "naked"), he has unlimited loss exposure and either has to buy back his call, or if the call is assigned, then the writer keeps the premium and delivers shares in the underlying security to the option holder at the lower strike price.	

C. The Steps to Exercise an Option to Collect Dividends

- 37. To exercise a long options contract, one has to send an exercise notice to the OCC. Exercises at the OCC occur after the end of each trading day. The OCC issues an assignment to the broker/dealer who is the custodian for the writer.
- 38. Assignments are made on a random basis by the OCC across the entire pool of broker/dealers who are the custodians for options writers for each call option series.

- 39. In order to receive a dividend on an underlying security, one must be the owner on the record date. To receive the dividend using an options strategy, one must exercise an "in the money" call option on the last trading day prior to the ex-dividend date in order to be the owner on the record date. The ex-dividend date is normally set for a security two business days prior to the record date for the dividend to allow time for the security purchase to be recorded on the register for the underlying security.
- 40. Historically, however, a percentage of "in the money" call holders have not exercised their calls to purchase the underlying dividend paying security on the day before the ex-dividend date. This failure to exercise is due to various reasons, including mistake or oversight, lack of economic resources to exercise the option, lack of sophistication, or ignorance of the process. The measure of these unexercised options is the contract's "open interest" at the close of trading on the day before ex-dividend. Open interest is the number of outstanding option contracts reported at the end of each day.

V. <u>IMPROPER MANIPULATIVE OPTIONS TRADING BY CERTAIN MARKET MAKERS ON PHLX EXCHANGE</u>

- 41. The Market Maker Defendants have conspired, engaged, and continue to conspire and engage, in improper market manipulation by artificially expanding the size of the option contract open interest pools to increase their *own* chances of not being assigned as writers of the calls on the day before the ex-dividend on the underlying security, thereby collecting the dividend. These actions thus ultimately allow the Market Maker Defendants to "skate" (*i.e.*, not be compelled to deliver the underlying security and thereby collect the dividend payment on the remaining underlying security position that they continue to hold since the calls they had written were not assigned by the OCC).
- 42. Market makers, unlike retail investors or other professional traders, have a unique advantage in that they are the only options industry participants that are permitted to be in both

long and short identical option contracts and to exercise any long options contracts prior to the OCC netting at the end of the trading day (their offsetting positions are not automatically extinguished by the OCC until after the market makers have decided whether to exercise). This advantage allows them to take these large offsetting positions without true risk.

- 43. The Market Maker Defendants' scheme is grounded in part by an OCC practice that the Market Maker Defendants improperly use to their advantage. When a market maker has offsetting open long and open short option positions in the same option series, the market maker is still permitted to exercise just one side of their positions. For market makers alone, the OCC does not net the short and long positions until after all the exercise instructions for that day have been processed. If a market maker fails to exercise any long option, the OCC will still net it against the market maker's short option positions, immediately prior to allocating assignments. The result of this practice is that the market maker is never at risk for failing to exercise an "in the money" long option while it has an offsetting short position. This special treatment of market makers by the OCC provides the Market Maker Defendants with the ability to execute large pre-arranged manipulative "wash" trades ("wash trades" are prohibited under SEC rules) to expand the open interest pool, of the relevant option and thereby radically increase the Market Maker Defendants' position in the open interest pool, thereby increasing their probability of capturing the dividend windfall from among the pool of unassigned call options.
- 44. In contrast to market makers, retail investors, like Plaintiff, generally are not permitted to have open long and short offsetting positions.
- 45. As a result, market makers are the only participants in the options market that can maintain both long and short market open positions without any consequent risk.

A. <u>Steps In The Manipulative Scheme To Improperly Capture Dividends</u>

- 46. The manipulative dividend scheme involve the Market Maker Defendants using their privileged role to capture as much of the potential "skate" of short call options for dividend paying securities. In order to do this, the Market Maker Defendants conspire to buy and sell the same series in prearranged trades of "in the money" calls with a "partner" broker deal the day prior to the ex-dividend date of the underlying stock or ETF. Multiple pairs of Market Maker Defendants engage in this conspiracy immediately prior to ex-dividend dates of securities. At the end of the day prior to the ex-dividend date, these participating Market Maker Defendants conspire to, and are, completely hedged with both huge open long and huge open short positions on the same call options series.
- 47. Once the Market Maker Defendants exercise their open long call options after the end of the day, their short option positions remain open prior to the OCC assignment process. This allows the Market Maker Defendants to dramatically expand the size of their collective share of the short call options open interest pool. Given the size of their holdings, the probability of the market makers' positions not being assigned is maximized and thus the Market Maker Defendants receive the majority of any dividend windfall after these maneuvers.
- 48. The Market Maker Defendants are not concerned about the large assignments allocated to them resulting from increasing their short positions because they have correspondingly exercised their dominant positions relative to the pre-existing open interest of long call options.
- 49. In other words, because the Market Maker Defendants conspire to be fully hedged, (buying and selling the same series for the same price), this illicit dividend trade strategy has little, if any, risk. The Market Maker Defendants either, skate and keep the dividend, or they get assigned on options series which they just exercised to end up with a net offsetting position.

Even if a Market Maker Defendant makes an error and fails to exercise, OCC will net their position prior to assignment so that the Market Maker Defendant winds up with no net option position in that series.

- 50. In addition, Market Maker Defendants conspire to flood the options market with the matched call options on stocks or ETFs about to go ex-dividend because market makers are given special margin privileges, ostensibly to allow them to open positions to provide liquidity to the market. However, rather than enhance market liquidity and engage in bona fide market making, the Market Maker Defendants have used this margin privilege to conspire to, and to engage in, these manipulative dividend trades in an unfair, deceptive and anti-competitive manner, solely for their own benefit.
- 51. The SEC has real time risk management rules which should normally restrict this abuse for the large dollar trades, Exchange Act Rule 15c3-1 and Regulation 15c3-5, 17 C.F.R. §§ 240.15c3-1 and 15c3-5. Under these rules, either the clearing firm or market maker must ensure there is available capital in the market maker's account or clearing member's account upon exercise of the option. These improper ex-dividend call option market-maker trades have been transacted without regard to the capital requirement at the time of the exercise of the calls. These dividend trades provide zero liquidity because their sole purpose is to steal the assignment opportunity and dividends from the non-market maker investors.
- 52. In possible violation of the net capital rules, the Market Maker Defendants have conspired to implement, and have implemented, these massive matched positions to capture the non-assignment opportunity. Notably, the Chicago Board of Exchange ("CBOE") bars such prearranged trades suggesting they are not done for legitimate economic purpose nor are the transactions subject to market risks. The International Stock Exchange ("ISE") similarly prevents this practice and has disseminated opinions that such trades are improper. In contrast,

Defendants NASDAQ/PHLX and NASDAQ OMX (improperly) have not limited such prearranged trading on the PHLX Exchange.

- 53. Market Maker Defendants' conspiracy with the assent of the Defendants NASDAQ/PHLX and NASDAQ OMX of prearranged matched trading is a classic form of market manipulation prohibited by Section 10(b) of the Exchange Act. This conspiracy to engage in manipulative transactions also contravenes numerous rules and regulations prescribed by the Securities and Exchange Commission ("SEC") that restrict the conduct and practices of market makers and others in order to maintain the integrity of the securities markets for the protection of investors. In addition to Rule 15c3-1 and Regulation 15c3-5 described above, these include the following:
 - a) Rule 10b-5(a) and (c), 17 C.F.R. § 240.10b-5(a) and (c) (prohibiting the employment of manipulative and deceptive devices or engaging in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person);
 - b) Rule 11b-1(a)(2)(ii)(iii), 17 C.F.R. § 240.11b-1(a)(2)(ii)(iii)⁶ (requiring specialists to maintain a "fair and orderly market" for investors)⁷.

(emphases added).

Exchange Act Rule 11b-1(a)(2) states in relevant part:

⁽²⁾ The rules of a national securities exchange permitting a member of such exchange to register as a specialist and to act as a dealer shall include:

⁽ii) Requirements, as a condition of a specialist's registration, that a specialist engage in a course of dealings for his own account to assist in the maintenance, so far as practicable, of a fair and orderly market, and that a finding by the exchange of any substantial or continued failure by a specialist to engage in such a course of dealings will result in the suspension or cancellation of such specialist's registration in one or more of the securities in which such specialist is registered;

⁽iii) Provisions restricting his dealings so far as practicable to those reasonably necessary to permit him to *maintain a fair and orderly market*

[&]quot;Specialists" are included in the Exchange Act's definition of "Market Makers." Section 3(a)(38), 15 U.S.C. § 78c(a)(38) states: "The term 'market maker' means any specialist permitted to act as a dealer...."

54. The Market Maker Defendants' manipulative transactions alleged herein also violated rules prescribed by NASDAQ, including Rule 782, prohibiting manipulative operations; Rule 1014(a), prohibiting Specialists and Registered Options Traders (ROT) from entering into transactions or make bids or offers that are inconsistent with the maintenance of a fair and orderly market; and Rule 1020(d), specifically prohibiting such options trading by a Specialist for his own account.

B. <u>A Detailed Example of How the Process Used by the Market Maker Defendants Works</u>

- 55. The following simplified example demonstrates how the market manipulation alleged herein works:
 - Stock is trading at \$40 and will pay a dividend of \$0.50 per share.
 - Dividend trade strategies are transacted in the in-the-money call options such that the market makers have agreed among themselves to use the dividend trade strategy in the \$30 strike calls series for the stock. (Note: A series of an option is a particular option that has a certain strike price and date of expiration in a particular stock.)
 - 10 retail investors each have written 1,000 \$30 strike calls on the stock before the stock goes ex-dividend.
 - Open interest in the \$30 strike calls (at the beginning of the trading day prior to the ex-dividend date) is therefore 10,000 contracts (each of the 10 retail investors are short 1,000 calls).
 - Each retail investor has a one in ten chance of not being assigned by the OCC ("skating") at the beginning of the trading day (1,000 divided by 10,000).
 - Market Maker One conspires to enter into trades with Market Maker Two. He sells 500,000 contracts of the \$30 strike call to Market Maker Two, meaning Market Maker One is now short that call. Immediately thereafter (pursuant to the prearranged agreement between Market Maker One and Market Maker Two), Market Maker Two sells 500,000 contracts of the same \$30 strike call to Market Maker One at the same price. That is, he executes a mirrored transaction in the exact same option series and of the exact same size and exact same price.

• At the end of the day, Market Maker One and Market Maker Two end up with the following positions in the \$30 strike calls:

Market Maker One

Market Maker Two

Long positions	Short positions	Long position
500,000	500,000	500,000

Long positions	Short positions
500,000	500,000

- Assume then 90% of market participants in the original open interest pool of 10,000 contracts exercise their call options, leaving 1,000 call options "unexercised." Because of the transactions of the market makers, the open interest has increased from 10,000 contracts to 1,010,000 contracts and the retail investor's chances of skating have fallen from 1/10 to 1/1,010 (from 10% to .099%).
- Market Makers One and Two will have exercised all of their long call options, meaning they are now long the stock (as illustrated by the lines stricken out in the following chart):

Market Maker One

Market Maker Two

Long positions	Short positions			
500,000	500,000			
options	options			
contracts	contracts			
↓				
Exercise all long options				
positions				
↓				
50,000,000 shares				

Long positions	Short positions			
500,000	500,000			
options	options			
contracts	contracts			
				
Exercise all long options				
positions				
↓				
50,000,000 shares				

- Market Maker One has exercised 500,000 call options. Market Maker One is assigned on 99.901% of his corresponding short calls (499,505 contracts). In the end, Market Maker One retains a balance of 495 short call options. He keeps the stock for 495 of the long call options he exercised and since a single option contract is equal to 100 underlying shares of the stock, the Market Maker One ends up with 49,500 shares of stock. He collects a dividend of \$0.50 on each of these shares, \$24,750 total.
- Market Maker Two has exercised 500,000 call options. Market Maker Two is assigned 99.901% of his corresponding short calls (499,505 contracts). In the end, Market Maker Two retains a balance of 495 short call options. He keeps the stock for 495 of the long call options he exercised and ends up with 49,500 shares of stock. He collects a dividend of \$0.50 on each of these shares, or \$24,750 total.

- Collectively, the pool of remaining retail investors is assigned on 99.901% of their short calls and as a group they are left with 10 short call contracts holding stock for 1,000 shares. The pool of retail investors therefore share just \$500 in dividends. Note that if the market makers had not been permitted to execute this dividend scheme the retail investors would have shared the full \$50,000 in dividend payments. Each writer would have received \$5,000 instead of the \$50.
- Both Market Makers One and Two have collected the dividend payments associated with those shares, and both remain fully hedged with short inthe-money calls. This means they can trade out of the hedged position (or wait until expiration if it is near) after they collect the dividend.
- Market Makers One and Two have each exercised shares of stock with a market value of \$2 billion (500,000 shares at \$40) without regard to the minimum capital requirement.
- Because of this manipulative practice Market Makers One and Two were able to extract 99% (\$49,500) of the dividend payments from the original call writers.
- 56. These incestuous trades among Market Maker Defendants do not serve any economic purpose. They do not provide any liquidity to the marketplace. Market Maker Defendants who engage in this practice wrongfully benefit at the expense of Plaintiff and other members of the Class. The rules of the various securities exchanges prohibit such pre-arranged "wash sales" since they do not serve any economic purpose. Market makers would normally be prohibited from making these sham trades because they are not within the bona fide market making functions that justify special margin treatment of market makers by an exchange because they do not help to maintain market liquidity.
- 57. Far from providing a "fair and orderly" options trading market for investors in which random assignment determines who receives the gain from the phenomenon of unexercised call options on days prior to ex-dividend, the Market Maker Defendants conspire to intentionally *disrupt* normal market activity by flooding the market with a massive volume of sham prearranged trades. The sole purpose of their trades is to wrongfully increase their *own*

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odds of non-assignment in order to misappropriate the underlying dividend for themselves at the expense of the Plaintiff and the other members of the Class.⁸

- 58. The Market Maker Defendants have been able to conspire and to engage in this manipulative trading scheme with the knowledge and knowing assistance of the Defendants NASDAQ/PHLX and NASDAQ OMX, securities clearing firms, and the OCC. In fact, each of these entities, along with the SEC itself, benefits by receiving increased trading fees from these sham trades. These regulatory institutions thus benefit by this options market manipulation. These symbiotic relationships cause these various regulatory bodies, self-regulatory organizations and market participants to turn a "blind eye" to these improper activities.
- 59. The role and benefit of each regulator or participant and the benefit that regulator or participant receives is as follows:
 - a. The Clearing Houses: Certain clearing houses, such as Merrill Lynch Professional Clearing Corporation (a subsidiary of Bank of America) ("Merrill Pro") and ABN AMRO Clearing Chicago (a subsidiary of ABN Fortis AMRO Clearing Bank N.V.) promote this dividend trade manipulation in order to receive: (a) transaction fees; (b) fees on margin interest for the market makers capital at risk and (c) interest on the massive balances used by the market makers to buy the options and underlying security if an option is exercised. Notably, these clearing houses give preferred pricing to market makers who do these market maker dividend strategy trades. In contrast, Goldman Sachs is one clearing house that does not permit this activity.

To artificially expand their call options, the market makers borrow on their margin accounts to cover the massive size of their options positions. To finance these massive positions, they use their market maker margin lending capacity provided by their clearing houses. The clearing firms encourage this "hidden" abuse of the net capital rules of the market makers because neither the clearing firms nor any regulatory body calculate the net capital ratios of the market making firms at the close of each trading day. Thus, they ignore the exercise of the market makers'

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Exhibit B attached to this Complaint is a chart delineating the trading data for major dividend yield stocks and ETFs in a typical quarter (3Q 2014), illustrating the breadth of this improper practice. Due to this improper strategy, as shown in the chart, just prior to the ex-dividend date there are consistently huge spikes in the volume for "in the money" option contracts on dividend paying stocks and ETFs. Additional data and analysis shows this practice has been widespread.

long options prior to any assignments by the OCC. In the Detailed Example above, prior to assignments each market maker would be long 50,000,000 shares of stock worth \$2 billion. The clearing houses are extending margin credit for these massive improper transactions in an amount that dramatically exceeds the clearing houses' stated risk parameters for such market making firms.

NASDAQ/PHLX: Although this market maker dividend manipulation has b. been prohibited by the CBOE and ICE exchanges, it has flourished on the PHLX Exchange because this exchange has permitted this fraudulent trade practice. The advantage of the market making dividend trades to the PHLX Exchange has been: (a) transaction fees; and (b) inflation of the exchange's reported trade volume. Such inflated exchange trade volume enhances the exchange's competitiveness and consequent attractiveness for investors, bondholders and creditors. Supporting this sham dividend trade activity, the PHLX Exchange gave low-cost pricing to the market makers via rebates for these dividend seeking transactions. Rebates have been given via a cap in charges per option series such that the increased volume of trading does not significantly raise the cost to the market maker of doing a huge volume of transactions. Similarly, rebates are given to cap the overall charges to the market maker per month. In short, there is relatively little additional cost to the market maker for its voluminous trading in this dividend play scheme.

The extremely inflated trading volumes, generated from these sham option trades, have improperly skewed the market value of the PHLX Exchange by inflating its national options volume market share. The distortion in options volume market share is clear when looking at the difference in options volume on days in issues when dividend trades are transacted as compared to when they are not. This false inflation of trading volume then has a multiplier effect for the PHLX Exchange since some market participants, especially those who use electronic option order routing, send their option order flow to the exchange which has the highest volume.

c. The OCC: The OCC receives fees for each trade by the market makers on these options. The OCC is owned by the exchanges so the exchanges further benefit from the inflated volume.

C. The Injury to Plaintiff from His Pfizer Inc. Options Positions Due to Defendants' Manipulative Practices

- 60. As described below, the conspiracy and manipulation by the Market Maker Defendants of the options contracts in Pfizer resulted in injury to the Plaintiff.
- 61. The Plaintiff's PFE options contracts had an expiration date of August 21, 2010 and a strike price of \$15. The PFE stock had an ex-dividend date of August 4, 2010. Therefore,

to obtain the dividend, an owner of a call option had to exercise his option on or before August 3, 2010 in order to be a shareholder of record on the dividend date of August 6, 2010 and therefore have a right to the dividend. The Market Maker Defendants' manipulations occurred on August 3, 2010. Plaintiff had his call assigned and exercised on August 3 (reported by his broker on August 4 as reflected in his attached certification attached as Exhibit A hereto).

- 62. On August 3, 2010, Plaintiff was short 68 call options on the PFE series expiring August 21, 2010 at the strike price of \$15 a share. This option was "in the money" as the stock was trading at \$16.34 at the close of trading on August 3, 2010.
- 63. At the very end of that same day (based upon information and belief), there were 14 separate rapid fire transactions by Market Maker Defendants totaling 1,312,000 contracts (out of the 1,419,021 contracts traded that day), which drastically increased the open interest pool on the PFE series at the strike price of \$15 and an expiration date of August 21, 2010. Each Market Maker Defendant had the same number of long positions as short positions, perfectly hedged. By conspiring to make, and by making, these manipulative and improper trades, the Market Maker Defendants expanded the open interest pool from the original 173,679 contracts by at least another 1,312,000 on that one day for a total open interest of 1,485,000 contracts, an increase of *over* 750%.
- 64. Each of the Market Maker Defendants then exercised all of their long call options, leaving each of them with only short call options. When the options were then assigned by the OCC, 16,545 short calls remained. Collectively, the Market Maker Defendants' holdings became the vast majority of the remaining short calls in the open interest pool (because they had a much higher percentage of the short positions). They thereby collected the bulk of the \$297,810 in PFE dividends from among the unexercised short call options (\$.18 dividend x 16,545 open options x 100 shares per option).

65. The remaining PFE investors, including Plaintiff, however, held a much smaller percentage of the short options than they would have, absent this manipulation of the market. Specifically, absent this manipulation, each PFE option contract would have obtained, on average \$1.71 per option contract, calculated as:

\$297,810 (dividends to distribute) ÷ 173,679 (options contracts open) = \$1.71 (per option) of the dividend distribution from the open interest pool. Instead, because of the manipulation, each contract only obtained, on average, the much smaller dividend distribution of \$.20 per option contract, calculated as:

\$297,810 (dividends to distribute) \div 1,485,679 (new open interest following manipulation) = **\$.20** (per option)

The Market Maker Defendants' thus caused all other investors to lose approximately \$1.51 per contract (\$1.71-\$.20), or over \$262,000 of the distributable dividends on this one incident of manipulation of option contracts. The Market Maker Defendants thus stole approximately 88% of what would have otherwise gone to Plaintiff and the other members of the Class investing in this PFE option.

- 66. Plaintiff Rabin also wrote 100 calls on December 17, 2010 (Expiration date 2/19/2011, strike price \$17) that was assigned on February 1, 2011 (reported by his broker on February 2, 2011). The Market Maker Defendants had again ballooned the open interest with 11 huge trades of 42,000 each, amounting to 462,000 in additional open interest on February 1, 2011. The prior day the open interest had been only 21,030.
- 67. There are thousands of incidents similar to the PFE option manipulation, many in the million dollar range, diverting the dividend payments on underlying stocks and ETFs to the Market Maker Defendants for their own financial benefit and not in any valid market making function.

- D. The Manipulation of the Options Contracts of CME Group, Inc. Provides

 Another Example of Market Maker Defendants' Practices and Resulting

 Injury
- Exchange is the pattern of Market Maker Defendants' trading in the open interest options contracts of the CME Group, Inc. (Stock Ticker: CME) in the days prior to the ex-dividend date of the underlying CME stock. In that incident, detailed below, the Market Maker Defendants inflated the size of the options open interest pool for CME stock by flooding the market with 440,000 additional option contracts one day before the ex-dividend date of the CME common stock. The result was to radically reduce all "ordinary" (*i.e.* typical) non-market maker investors' share of unassigned options on CME. The Market Maker Defendants' short option holdings increased the size of the open interest pool and thereby directed the dividend payments to the Market Maker Defendants for these extraordinary trades. The CME incident provides another stark illustration, but is only one example, of Market Maker Defendants' manipulative trading activities in numerous option contracts.
- 69. The CME options contracts involved in the CME manipulation had an expiration date of January 18, 2014 and a strike price of \$65. The CME stock had an ex-dividend date of December 24, 2013. Therefore, to obtain the dividend, an owner of a call option had to exercise his option on or before December 23, 2013 in order to be a shareholder of record on December 27 and therefore have a right to the dividend. The Market Maker Defendants' manipulations in the CME example occurred on December 23, 2013.
- 70. On December 23, 2013 (based upon information and belief) at least ten market makers drastically increased the open interest pool. Each Market Maker Defendant bought and sold 40,000 contracts on CME series at a strike price of \$65 with an expiration date of January 18, 2014 to each other; the result was that each Market Maker Defendant had 40,000

long positions and 40,000 short positions, thus perfectly hedged. The ten Market Maker Defendants had thereby expanded the open interest pool from the original 20,027 contracts to approximately 460,000 contracts in one day, an increase of over 2200%.

- 71. Each of the Market Maker Defendants then exercised all of their long call options, leaving each of them with 40,000 short call options. When the options were then assigned by the OCC, 20,001 short calls remained. Collectively the Market Maker Defendants skated on the vast majority of the short calls in the open interest pool (because they had a much higher percentage of the short positions). They thereby collected the bulk of the dividends on CME from the unassigned short call options.
- 72. As a result, the remaining CME investors skated on a much smaller number of options than they would have absent this manipulation of the market. Instead of obtaining, on average:

 $$5,200,260 \text{ (dividend)} \div 20,000 \text{ (open short options)} = $260.01 \text{ (dividend payment per open option)}$

from the dividend distribution, because of the manipulation, each contract only obtained:

\$5,200,260 (dividend) ÷ 460,000 (open short options) = \$11.30 (dividend payment per open option)

The Market Maker Defendants thus stole over 95% of what would have gone to all other investors in the open interest pool.

73. In the CME incident, the Market Maker Defendants' actions caused all other investors to lose approximately \$249 per contract, or over \$4.9 million on this one incident. There are numerous such multi-million dollar incidents capturing the dividend payment by the Market Maker Defendants for themselves. This CME example provides an illustration, but is only one example, of Market Maker Defendants' manipulative trading activities in numerous

open interest option contracts that benefitted Market Maker Defendants while wrongfully depriving typical investors of the value of the dividend payments.

VI. PLAINTIFF AND THE MEMBERS OF THE CLASS WERE DAMAGED BY DEFENDANTS' MANIPULATIVE PRACTICES

74. Individual retail investors, legitimate market making professionals, and non-market making professionals, who were short (*i.e.*, had written call positions in the relevant options) had their chances of skating (and thereby earning the dividend payment) reduced dramatically because of the dividend manipulation conspiracy of the Defendants. Defendants' conspiracy dramatically increased the size of the short call option pool the day before underlying securities went ex-dividend. As a result, Plaintiff and other Class members were damaged. Market Maker Defendants (with the knowing acquiescence and participation of the complicit Defendants NASDAQ/PHLX and NASDAQ OMX in furtherance of the scheme) routinely engaged in this option trade strategy and thereby improperly appropriated the dividends to themselves. All writers of the calls, including Plaintiff and other members of the Class, were harmed by this manipulative device – even if they became aware of the practice since there was no alternative for call options writers.

VII. ADDITIONAL SCIENTER AND RELIANCE ALLEGATIONS

- 75. National securities exchanges historically operated as not-for-profit mutual organizations charged with enforcing market rules to protect investors. This structure was intended to minimize conflicts of interest between the exchanges and the investing public and to enable the exchanges to fulfill their roles as self-regulatory organizations.
- 76. Since the mid-1990s, the exchanges have demutualized, adopting a "for-profit" model that conflicts with their responsibilities as self-regulatory organizations.
- 77. As recognized by the securities industry, "[t]he traditional model of selfregulation for the exchanges found its justification in the alignment of interests between the

investing public and member firms," but that model has given way to the exchanges "now [being] oriented toward maximizing profits for their shareholders."

78. Commentators have noted the recent exchanges' fundamental shift from a regulatory to a profit-making role. As the lobbying arm of the broker-dealer industry has admitted:

[T]he interests, incentives and functions of the member-owned cooperative exchange of 1934 bear little resemblance to those of the for-profit publicly traded exchange of today. Since the wave of demutualizations, exchanges have rightly focused their efforts on the part of their business that earns profits to maximize the return for their shareholders, and, in some cases, *minimized their actual performance of regulatory functions*.⁹

- 79. A federal district court has summarized this transformation most succinctly: "As exchanges have evolved into for-profit enterprises, an irreconcilable conflict has arisen, rendering independence unattainable in the context of an exchange regulating its own, for-profit business conduct." ¹⁰
- 80. Defendant NASDAQ/PHLX gave special treatment to the Market Maker Defendants who engaged in matched trading on the PHLX Exchange on days prior to the exdividend date. This special treatment allowed the Market Maker Defendants to capture the assigned open interests for the valuable dividends. This trading scheme has nothing to do with NASDAQ/PHLX's duties as a self-regulatory organization (such as the regulatory oversight of its respective members or the discharge of any regulatory duties it has under the securities laws) and everything to do with serving its profit-based motives. Defendant NASDAQ/PHLX profited by attracting more trades than it would have, thereby reaping trading fees and dramatically boosting call option trading activity on the exchange. As alleged above, the huge trading spike

Letter from the Securities Industry and Financial Markets Association to SEC Chair Mary Jo White, July 31, 2013, *available at* www.sifma.org/issues/item.aspx?id=8589944673 (emphasis added).

In re Facebook, Inc., IPO Secs. and Derivative Litig., 986 F.Supp.2d 428, 453 (S.D.N.Y. 2013).

caused by the Market Maker Defendants' sham trades enabled Defendant NASDAQ/PHLX to report inflated trade volumes and market share, thereby enhancing its competitiveness in order to generate yet additional revenue. In doing so, Defendant NASDAQ/PHLX was serving its private business interests and acting outside of its role as a self-regulatory organization. These business decisions permitting the manipulative transactions for the exchange's own profit serve as the basis of the claims of Plaintiff and other members of the Class. Defendant NASDAQ/PHLX and Defendant NASDAQ OMX reaped these profits at the expense of Plaintiff and other members of the Class.

81. As alleged herein, all Defendants acted with scienter in that all the Defendants were motivated to allow the wrongful conduct alleged herein and had actual knowledge of and/or willfully participated in the fraudulent conduct alleged herein. In similar situated transactions, the Market Maker Defendants massively diluted the open interest pools to obtain a larger portion of the "skate" than the rest of the investing public, thereby realizing hundreds of millions of profit from their illegal conduct. Defendants NASDAQ/PHLX and NASDAQ OMX profited by increased revenue from the high volume of these manipulative trades made on the PHLX Exchange as well as by reporting a greater market share of options trades. The increased volume was not related to any valid purpose and reflected simply the activity of the Market Maker Defendants buying and selling the same contracts, akin to wash sales. The conduct of the Market Maker Defendants, as alleged herein, had no legitimate market making purpose other than to manipulate the market. The actions of the Market Maker Defendants created no additional liquidity to the market although their role and privileges are to ensure liquidity. The Market

As previously noted, parent NASDAQ OMX Group, Inc. ("NASDAQ OMX") is the sole owner of the PHLX Exchange through its subsidiary NASDAQ/PHLX. NASDAQ OMX is a for-profit entity and, is not itself a securities exchange and is not a self-regulatory organization.

Maker Defendants knowingly exceeded their allowed margins and credit requirements while doing these manipulative dividend trades.

- 82. In sum, Defendants were motivated to participate in the wrongful scheme by the enormous profits they took. They systematically participated in the scheme with knowledge of its consequences to other investors.
- 83. Other investors, including Plaintiff and other members of the Class, assumed the existence of an honest and fair market when selling options in the marketplace. Plaintiff and other members of the Class believed that the Market Maker Defendants provided liquidity rather than that the Market Maker Defendants were deceptively taking the dividends for themselves.

VIII. PLAINTIFF'S CLASS ACTION ALLEGATIONS

- Plaintiff brings this action as a class action pursuant to Federal Rule of Civil Procedure 23(a) and 23(b)(3) on behalf of a Class, consisting of all persons who held short positions on "in the money" call options contracts on dividend paying stocks and ETFs and who were adversely affected by Defendants' conspiracy to manipulate, and manipulation of the options markets prior to the ex-dividend date on such securities from February 6, 2010 through the present (the "Class Period"). Excluded from the Class are Defendants, members of their immediate families and their legal representatives, parents, affiliates, heirs, successors or assigns and any entity in which Defendants have or have had a controlling interest (the "Excluded Persons"). Also excluded are any officers, directors, or trustees of the Excluded Persons.
- 85. The members of the Class are so numerous that joinder of all members of the class is impracticable. The exact number of Class members is unknown to Plaintiff at this time but can be ascertained through appropriate discovery. Plaintiff believes that there are thousands of members of the proposed Class. Members of the Class may be identified through records kept

by the PHLX Exchange and the OCC and may be notified of the pendency of this action by mail or electronically, using the form of notice customarily used in securities class actions.

- 86. Plaintiff's claims are typical of the claims of the members of the Class as all members of the Class are similarly affected by Defendants' wrongful conduct.
- 87. Plaintiff will fairly and adequately protect the interests of the members of the Class and has retained counsel competent and experienced in class and securities litigation.
- 88. Common questions of law and fact exist as to all members of the Class and predominate over any questions solely affecting individual members of the Class. Among the questions of law and fact common to the Class are:
 - a. Whether Defendants implemented the manipulative acts, devices or contrivances or engaged in the alleged fraudulent scheme and course of business alleged herein;
 - b. Whether rules and regulations governing market makers were violated by Defendants' acts as alleged herein;
 - c. Whether Defendants' actions artificially and repeatedly inflated the size of the options open interest pool;
 - d. Whether Defendants acted with scienter in connection with the wrongful conduct:
 - e. Whether Plaintiff and the other members of the Class have sustained damages and, if so, the appropriate measure thereof; and
 - f. Whether Defendants were unjustly enriched through their actions.
- 89. Every Class member relied on the assumption that they were trading in an honest and fair market free of manipulation by fraudulent means.
- 90. A class action is superior to all other available methods for the fair and efficient adjudication of this controversy since joinder of all members is impracticable. Furthermore, as the damages suffered by individual Class members may be relatively small, the expense and burden of individual litigation make it impossible for members of the Class to individually

redress the wrongs done to them. There will be no in insurmountable difficulty in the management of this action as a class action.

91. This action is also properly maintainable as a class action under Federal Rule of Civil Procedure 23(b)(2) because Defendants have conspired and acted on grounds that apply generally to the Class in that they conducted the illegal behavior complained of herein and have continued to do so. Final injunctive relief or corresponding declaratory relief is thus also appropriate respecting the Class as a whole.

COUNT I

Violation of Section 10(b) of the Exchange Act And Rule 10b-5(a) and (c) Promulgated Thereunder Against All Defendants

- 92. Plaintiff repleads and realleges the allegations in the prior paragraphs as if set forth in full.
- 93. This claim is brought pursuant to Section 10(b) of the Exchange Act, 15 U.S.C. § 78j and Rule 10b-5(a) and (c), 17 C.F.R. § 240.10b-5(a) and (c) against all Defendants.
- 94. During the Class Period, each of the Defendants, individually and in concert, directly and indirectly, by the use, means, or instrumentalities of interstate commerce and/or the mails, carried out a plan, scheme and course of conduct which was intended to, and throughout the Class Period, did manipulate the options to the detriment of the investing public, including Plaintiff and other Class members, in connection with the purchase and/or sale of options contracts.
- 95. Defendants, conspired, and employed devices, schemes, and artifices and engaged in acts, practices, and a course of business as alleged herein to unlawfully manipulate and profit from illegal trading in options contracts.

- 96. Defendants' actions constitute manipulative acts. Through massive matched trades, Defendants utilized their margin and other privileges to falsely increase volume in the options to benefit themselves.
- 97. Plaintiff and other members of the Class traded in options during the Class Period and held one or more short positions on options contracts during the Class Period and thereby suffered losses as a result of the Defendants' trading which manipulated the options marketplace.
- 98. Plaintiff and other members of the Class were damaged by relying on an assumption of an honest and fair market, free of manipulation, when buying and selling options in the marketplace.
- 99. Defendants acted with scienter in connection with the manipulative acts alleged herein in that they acted knowingly and/or recklessly when they artificially inflated the size of the options open interest pool and thereby interfered with the market for options.
- 100. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff and other members of the Class were damaged as a result of their purchase or sale of the options.
- 101. By virtue of the foregoing, Defendants have violated Section 10(b) of the Exchange Act, and Rule 10b-5(a) and (c) promulgated thereunder.

COUNT II Unjust Enrichment Against All Defendants

- 102. Plaintiff repleads and realleges the allegations the prior paragraphs as if set forth in full.
- 103. The Market Maker Defendants have benefitted through the acts complained of herein. The Market Maker Defendants have earned a huge windfall on option contracts. NASDAQ/PHLX and NASDAQ OMX have benefitted by collecting fees on the increased trading activity.

- 104. As a direct and proximate result of Defendants' manipulation of the options market, Plaintiff and other Class members have suffered damages in an amount to be proven at trial.
- 105. In equity and in good conscience, it would be unjust and inequitable to permit Defendants to enrich themselves at Plaintiff's and other Class members' expense and to retain the benefits of their inequitable conduct.
- 106. Plaintiff and other members of the Class are entitled to the establishment of a constructive trust impressed on the benefits to Defendants from their unjust enrichment and inequitable conduct.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff and the Class pray for judgment as follows:

- 107. Declaring this action to be a proper class action maintainable pursuant to Rule 23 of the Federal Rules of Civil Procedure and declaring Plaintiff to be a proper class representative.
- 108. Awarding Plaintiff and the Class compensatory damages as a result of the wrongs alleged herein, including interest thereon, and further awarding disgorgement and restitution.
- 109. Declaratory Judgment and/or injunctive relief requiring Defendants to end the practices complained of herein.
- 110. Awarding Plaintiff and the Class their costs and expenses in this litigation, including reasonable attorneys' fees, experts' fees, and other costs.
- 111. Granting Plaintiff and the Class such further relief as allowed by law and/or as is equitable under the circumstances.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Dated: May 19, 2015 Respectfully submitted,

BERGER & MONTAGUE, P.C.

/s/ Lawrence Deutsch

Lawrence Deutsch, PA Bar No. 45653 Robin B. Switzenbaum, PA Bar No. 44074 Phyllis M. Parker, PA Bar No. 77336 1622 Locust Street Philadelphia, PA 19103

Tel: (215) 875-3000 Fax: (215) 875-4604 Email: ldeutsch@bm.net rswitzenbaum@bm.net pparker@bm.net

Jeffrey H. Squire Lawrence P. Eagel

BRAGAR EAGEL & SQUIRE, P.C.

885 Third Ave., Suite 3040 New York, NY 10022 Tel: (212) 308-5858 Email: squire@bespc.com

eagel@bespc.com

Attorneys for I. Stephen Rabin

KAL6981849

EXHIBIT A

IN THE UNITED STATES DISRTICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

I. STEPHEN RABIN, on behalf of himself and	CIVIL ACTION
all others similarly situated,	NO
Plaintiff	CLASS ACTION
V.	TRIAL BY JURY DEMANDED

John Doe Market Makers,

NASDAQ OMX PHLX LLC, and

NASDAQ OMX GROUP, INC.

Defendants

CERTIFICATION

- I. Stephen Rabin, hereby certify, as to the claims asserted under the federal securities laws, that:
 - 1. I have reviewed the complaint and authorize its filing.
 - I did not transact in the securities that are the subject of this action at the direction of counsel or in order to participate in any action arising under the federal securities laws.
 - I am willing to serve as a representative party on behalf of the Class, including providing testimony at deposition and trial, if necessary.
 - My transactions in the Pfizer, Inc. securities that are the subject of this action are set forth below:

Transactions

Transaction	Date		Price
Purchase	7/13/2010	6,800 shares	14.8800
Sale	7/13/2010	68 calls (exp. 8/21/10, strike \$15)	0.3700
Assignment	8/4/2010	68 calls	0.00
Sale	8/4/2010	6,800 shares	15.0000
Purchase	8/18/2010	10,000 shares	16.1100
Sale	8/19/2010	100 calls (exp. 9/18/10, strike \$16)	0.5600

Purchase	9/14/2010	100 calls (exp. 9/18/10, strike \$16)	.9800
Sale	9/21/2010	100 calls (exp. 10/16/2010, strike \$17)	.4800
Purchase	10/14/2010	100 calls (exp. 10/16/2010, strike \$17)	.8000
Sale	10/14/2010	100 calls (exp. 11/20/2010, strike \$18)	.3800
Sale	12/17/2010	100 calls (exp. 2/19/2011, strike \$17)	0.5488
Dividend	12/1/2010	N/A	1.8000
Assignment	2/2/2011	100 calls (exp. 2/19/2011, strike \$17)	0.00
Sale	2/2/2011	10,000 shares	17.0000

- I have not sought to serve as a lead plaintiff or representative party on behalf of a class in any action under the federal securities laws filed during the three-year period preceding the date of this Certification.
- I will not accept any payment for serving as a representative party on behalf of the Class beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages) directly related to the representation of the Class, as ordered or approved by the Court.

I declare under penalty of perjury that the foregoing is true and correct Executed this day of Junuary 2015

I. Stephen Rabin

EXHIBIT B

Ongoing and Massive Trading Manipulation for a Typical Quarter (2014 Q3)

				Total for Q3 2014	Total Quarterly Trade Volume 14,345,938		Total Dividend Payments to Open Interest \$41,766,838
Ex Dividend Date	Company	Expiration Date	Sirike	Coerr Interest Before Manipulation	One Day's Ballooned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interest
7/01/14	BRISTOL-MYERS SQUIBB COMPANY	7/19/14	45	478	1,201	251%	\$6,912
7/01/44	BRISTOL-MYERS SQUIBB COMPANY	7/19/14	47	974	1,211	124%	\$9,972
7/01/14	BRISTOL MYERS SQUIBB COMPANY	9/20/14	40	271	650	240% 349%	\$1,872 \$1,332
7/01/14	BRISTOL-MYERS SQUIBB COMPANY BRISTOL-MYERS SQUIBB COMPANY	1/17/15	26 30	130		473%	\$6,444
7/01/14	BRISTOL-MYERS SQUIBE COMPANY	1/17/15	32	130		500%	\$2,736
7/01/14	BRISTOL-MYERS SQUIBB COMPANY	1/17/15	35	317	1,070	336%	\$7,418
7/01/14	BRISTOL-MYERS SQUIBE COMPANY	1/17/15	37	1,421	4,700	331%	\$2,952
7/01/44	GENERAL DYNAMICS ICICI BANK LIMITED	7/19/14	100			198%	\$4,030 \$2,457
7/01/14	ICICI BANK LIMITED	1/17/15	20			538%	\$6,066
7/01/14	ICICI BANK LIMITED	1/17/15	28	261	1,500	498%	\$10,980
7/01/14	ICICI BANK LIMITED	1/17/15	30		1,050	498%	\$10,980
7/01/14	ICICI BANK LIMITED	7/17/15	33	370	1,250	336% 305%	\$9,751 \$1,200
7/01/14	JPMORGAN CHASE & CO JPMORGAN CHASE & CO	7/19/14	50			305%	\$10,980
7/01/14	JPMORGAN CHASE & CO	7/19/14	52.3	4,280		337%	321,640
7/01/14	JPMORGAN CHASE & CO	7/19/14	55		64,967	219%	\$209,040
7/01/14	JPMORGAN CHASE & CO.	8/16/14	50 50			107% 155%	\$11,640 \$19,000
7/01/14	JPMORGAN CHASE & CO JPMORGAN CHASE & CO	1/17/15	30			403%	\$7,520
7/01/14	JPMORGAN CHASE & CO	1/17/15	35		1,075	407%	\$9,880
7/01/14	JPMORGAN CHASE & CO	1/17/15	38			≠30%	\$32,000
7/01/14	JPMORGAN CHASE & CO	1/17/15	40			434%	179,000
7/01/14	JPMORGAN CHASE & CO JPMORGAN CHASE & CO	1/17/15	42			431% 324%	\$50,320 \$126,080
7/01/14	JPMORGAN CHASE & CO	1/15/16	30			425%	\$6,000
7/01/14	JPMORGAN CHASE & CO	1/15/16	35			429%	\$44,160
7/01/14	JPMORGAN CHASE & CO	1/15/16	40			599%	5296,000
7/01/14	MEDTRONIC INC	1/17/95	40			200% 246%	\$3,508 \$6,723
7/01/14	MEDTRONIC INC MONSANTO COMPANY (NEW)	7/19/14	105		1,827	197%	\$1,290
7/01/14	MONSANTO COMPANY (NEW)	7/19/14	110			142%	\$3,096
7/01/14	MONSANTO COMPANY (NEW)	7/19/14	116			119%	\$15,050
7/01/14	MONSANTO COMPANY (NEW)	1/17/15	78			253% 256%	54,988 57,826
7/01/14	MONSANTO COMPANY (NEW) SYSCO CORPORATION	1/17/15	80 28			345%	\$5,248
7/01/14	SYSCO CORPORATION	1/17/15	30			262%	\$5,684
7/01/14	Shares 20+ Year Treasury Bond ETF	7/19/14	109			202%	\$2,889
7/01/14	iSharas 20+ Year Treasury Bond ETF	7/19/14	110			150% 259%	\$10,395 \$541
7/02/14	Atlas Resource Partners LP CISCO SYSTEMS INC.	7/19/14 7/03/14	17.5 24.5		4,790	170%	57,182
7/02/14	CISCO SYSTEMS INC.	7/19/14	18			260%	\$2,603
7/02/14	CISCO SYSTEMS INC.	7/19/14	19			252%	\$5,377
7/02/14	CISCO SYSTEMS INC.	7/19/14	20			263% 281%	\$3,914 \$12,141
7/02/14	CISCO SYSTEMS INC.	7/19/14	21			221%	\$32,861
7/02/14	CISCO SYSTEMS INC.	7/19/14	23			157%	\$27,056
7/02/14	CISCO SYSTEMS INC.	7/19/14	24			285%	8317,291
7/02/14	CISCO SYSTEMS INC.	10/18/14	17		9,800	278%	\$570 \$980
7/02/14	CISCO SYSTEMS INC. CISCO SYSTEMS INC.	10/18/14	19			264%	\$3,040
7/02/14	CISCO SYSTEMS INC.	10/18/14	21	2.494		221%	\$5,187
7/02/14	CISCO SYSTEMS INC.	1/17/15	10			434%	\$6,403
7/02/14	CISCO SYSTEMS INC.	1/17/15	13			42% 4600	\$2,964 \$62,546
7/02/14	CISCO SYSTEMS INC.	1/17/15	15			464W	\$39,710
7/02/14	CISCO SYSTEMS INC.	1/18/16	13			433%	89,234
7/02/14	CISCO SYSTEMS INC.	1/15/16	15		19,600	465%	\$71,877
7/02/14	Shares Russell 2000 ETF	7/19/14	100			250%	\$24,571
7/02/14	iShares Russell 2000 ETF iShares Russell 2000 ETF	7/19/14	105			1669L 242%	\$2,638 \$9,770
7/02/14	iShares Russell 2000 ETF	1/17/15	70			239%	\$15,436
7/02/1/	Shares Russell 2000 ETF	1/17/15	75	205		260%	\$10,014
7/02/14	iShares Russoll 2000 ETF	1/17/15	30			275%	\$28,234
7/02/14	iShares Russell 2000 ETF MOBILE TELE SYSTEMS OUSC	9/20/14	83 15			203%	\$25,743
7/02/14	MOBILE TELE SYSTEMS OJSC	9/20/14	17			474%	\$7,738
7/02/14	MOBILE TELE SYSTEMS 0J8C	12/28/14	15	218	990	454%	\$24,210
7/03/14	American Really Capital Properties inc	10/16/14	70			189%	\$7,191
7/03/14	American Realty Capital Properties Inc. CAMPBELL SOUP CO	1/17/15 8/16/14	*Q			268% 220%	\$8,300 \$998
7/07/14	TORONTO DOMINION BANK	7/19/14	50			778%	\$4,106
7/07/14	TORONTO DOMINION BANK	10/18/14	45	304	825	271%	\$8,725
7/08/14	Aeina Inc	7/19/14	70			181%	\$743
7/08/14	Aetna Inc. GENERAL MILLS	7/19/14	75 52.5			224% 124%	54,230 519,988
7/08/14	GENERAL MILLS	1/17/15	45			350%	\$66,579
7/08/14	AT 8 T Inc	7/13/14	35	2,011	8,394	318%	57,064
7/08/14	AT & T ind	7/11/14	35.5	2,246	4,237	189%	\$25,828

© Dividend Date	Скитовну	Expiration Date	Sinke	Open Interest Before Manipulation	One Day's Balaoned Volume	Increase in Open Interest Following Manipulative Trading	Divident Payments to Open Interest
7/08/14	AT & T Inc	7/19/14	30	36.	272	309%	\$2,622
7/08/14	AT & Tinc	7/19/14	31	171	510	295%	\$2,530
7/08/14	AT & T Inc	7/19/14 7/19/14	32 33	325	672 9.823	268% 218%	\$1,840
7/08/14	AT & Tinc	7/19/14	34	4,515	66,285	302%	\$152,628
7/08/14	AT & Time	7/19/14	35	22,345	64,627	289%	\$122,820
7/08/14	AT & Tinc	7/25/14	35	4,756	11,466	241%	\$1,610
7/08/14	AT & Ting	8/18/14	33	2,815	7,845	279%	\$71,530
7/08/14	AT & Tinc AT & Tinc	8/16/14 5/20/14	34	2,322 1,210	6,537 3,115	282% 257%	519,412 58,326
7/08/14	AT & T Inc	B/20/14	34	1 100	2,583	244%	\$10,948
7/08/14	AT & T Inc	10/10/14	30	80	325	369%	\$3,498
7/08/14	AT A TING	10/18/14	31	163	551	399%	\$1,610
7/08/14	AT & Tinc AT & Tinc	10/18/14	33	353 0.570	18,367	263% 280%	\$2,346 610,902
7/08/14	AT & Tinc	1/17/18	25	128	841	657%	\$5,842
7/08/14	AT & Tinc	1/17/15	28	705	A,900	595%	\$6,394
7/08/14	AT A T Inc	1/47/15	30	4.209	29,425	599% 440%	\$133,998
7/08/14	AT & T Inc	1/17/15	18	852 90	3,750 606	573%	\$5,428 \$1,840
7/08/14	AT & T Inc	1/15/16	25	735	5,178	704%	\$24,055
7/08/14	AT & Ting	1/16/16	29	4.078	28,568	701%	\$168,886
7/08/14	AT & T Inc VERIZON COMM	7/17/14	30	8,882 1,335	62,276 2,786	701%	\$317,538
7/08/14	VERIZON COMM	7/19/14	39	369	829	227%	\$16,008 \$13,197
7/08/14	VERIZON COMM	7/19/14	43	88%	1,295	277%	\$21,412
7/08/14	VERIZON COMM	7/19/14	45	2,487	6,966	282%	\$1,855
7/08/14	VERIZON COMM VERIZON COMM	7/19/14	46	2,093	5,922 11,708	283% 285%	\$5,989 \$64,672
7/08/14	VERIZON COMM	7/10/14	49	6,135	14,225	232%	817,384
7/08/14	VERIZON COMM	7/19/14	49	12,300	24,691	201%	\$81,355
7/08/14	VERIZON COMM	8/16/14	32	360	975	271%	\$19,080
7/08/14 7/08/14	VERIZON COMM VERIZON COMM	8/16/14 8/16/14	3B 44	205 324	1,356	253% 259%	\$1,643 \$2,756
7/08/14	VERIZON COMM	8/36/14	47	2,998	8,423	281%	\$2,703
7/09/14	VERIZON COMM	10/16/14	46	2,002	5,602	280%	\$15,317
7/08/14	VERIZON COMM	1/17/10	30	93	₹50	699%	\$4,664
7/08/14 7/08/14	VERIZON COMM VERIZON COMM	1/17/15	36 40	277 980	7,002	655% 714%	\$13,939 \$37,683
7/08/14	VERIZON COMM	1/17/15	42	5,662	26,807	470%	\$155,979
7/09/14	VERIZON COMM	1/17/15	43	233	800	343%	\$2,544
7/08/14	VERIZON COMM	1/15/18	35	1,178	5,010	765%	#61,904
7/08/14	VERIZON COMM VERIZON COMM	1/15/16	36	2,178 6,065	15,520 50,008	713%	\$88,628 \$295,528
7/09/14	AMERICAN EXPRESS	7/19/14	77.5	473	1,10%	234%	\$3,718
7/09/14	AMERICAN EXPRESS	7/19/14	82.5	236	552	234%	\$1,718
7/09/14	AMERICAN EXPRESS	7/19/14	87,5	1,186	2,020	170%	81,066
7/09/14 7/09/14	AMERICAN EXPRESS BreitBurn Energy Pariners L.P.	7/19/14	90 20	5,612	7,517 3,003	129% 300%	\$4,982 \$15,231
7/09/14	BreitBurn Energy Partners L.P.	1/15/16	17,5	239	1,200	502%	\$4,003
7/09/14	BreitBurn Energy Partners L.P.	1/15/16	28	844	2,110	250%	819,851
7/09/14	BIG LOTS INC. COSTCO COMPANIES	7/19/14	100	1,737	3,740 858	215% 270%	\$527 £3,053
7/09/19	COSTCO COMPANIES	7/19/14	105	386	1,285	333%	51,611
7/09/14	COSTCO COMPANIES	7/19/14	110	1,717	3,925	229%	\$24,566
7/09/14	Himex Technologies Inc.	7/19/14	5	129	160	124%	5810
7/09/14	Himax Technologies Inc. Kraft Foods Group, Inc.	9/20/14	55	167	1.784	129%	\$2,187 \$7,140
7/09/14	Kraft Foods Group Inc.	1/17/18	50	1,220	4,860	398%	\$4,630
7/09/14	Kraft Foods Group Inc.	1/17/15	52.5	1,912	5,724	299 W	\$9,138
7/09/14	Kraft Foods Group Inc. Linn Energy LLC-Units	1/15/16 7/19/14	₽7.5 25	324 177	1.210	373% 268%	\$2,363 \$1,740
7/09/14	Linn Energy LLC-Units	7/19/14	29	1,300	2,965	228%	\$9,817
7/09/14	Linn Energy LLC-Units	7/19/14	30	3,408	12,779	375%	\$8,188
7/09/14	Linn Energy LLC-Units	7/19/14	31	2,835	9.506	339%	\$4,764
7/09/14	Linn Energy LLC-Units Linn Energy LLC-Units	1/17/15	28	1,544	5,107	331% 847%	\$23,411
7/09/14	Linn Energy LLC Units	1/17/15	23	139	920	662%	\$2,923
7/09/14	Linn Energy LLC-Units	1/17/15	25	1,057	7.410	701%	\$24,692
7/09/14	Linn Energy LLC-Linits	1/17/15	27 28	246 2,689	1,930	419% 469%	\$2,295
7/09/14	Linn Energy LLC-Units Linn Energy LLC-Units	1/15/16	23	554	2.800	505%	\$43,222 \$13,385
7/09/14	Linn Energy LLC-Units	1/15/16	25	455	2,100	462%	\$8,963
7/09/14	Linn Energy LLC-Units	1/15/16	27	1,053	4,900	461%	\$25,368
7/09/14	Linn Go. LLC Linn Go. LLC	7/19/14 7/19/14	28	519 3,133	1,707 3,490	276%	\$5,146 \$2,076
7/09/14	Linn Co, LLC	7/19/14	30	3,372	5,691	169%	\$10,244
7/09/14	Linn Go, LLC	8/18/14	2/	584	1,595	273%	\$62B
7/09/14	Liner Co. LLC	8/16/14	26	459	1,257	276%	\$4,663
7/09/14	Linn Co. LLC Linn Co. LLC	11/22/14	27 25	6,190 167	18,602 608	301% 362%	\$149,309 \$4,035
7/09/14	Linn Co. LLC	1/17/15	27	627	1,776	283%	\$10,123
7/09/14	Linn Co. LLC	1/15/16	23	295	1,100	386%	36,886
7/09/14	Linn Co. LLC POTASH CORP	7/11/14	35	2,121	8,461 321	396% 196%	\$42,739 \$4,550
7/09/14	POTASH CORP	7/19/14	34	163	515	316%	\$1,525
7/09/14	POTASH CORP	7/19/14	35	714	2,332	327%	\$3,290
7/09/14	POTASH CORP	7/19/14	36	2,189	7,714	351%	\$7.560

Ev Dividend Date	Company	Expiration Date	Strike	Open Interest Before Manipulation	One Day's Ballooned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interest
7/09/14	POTASH CORP	9/20/14	30	236	785	333%	\$2,905
7/09/1=	POTASH CORP.	9/20/1/	32	322	1,030	320%	\$1,715
7/09/14	POTASH CORP	1/17/15	15	81	400	494°X	\$2,835
7/09/1=	POTASH CORP	1/17/15	20	590	2,620	444%	\$19,810
7/09/14	POTASH CORP	1/17/15	23 25	448 891	1,950 4,200	471%	\$13,545 \$21,845
7/09/14	POTASH CORP	1/17/15	28	1,773	8,461	474%	\$36,050
7/09/14	POTASH CORP	1/17/15	30	4,592	16,106	351%	867,725
7/09/14	POTASH CORF	1/15/16	20	109	515	472%	53,430
7/09/14	POTASH CORP	1/15/16	23	147	650	442%	\$4,760
7/09/14	POTASH CORP	1/15/16	25	600	2,000	433%	\$10,010
7/09/14	RAIT Financial Trust	7/19/14	7	353	770	218%	\$2,160
7/09/14	RAIT Financial Trust	10/18/14	7	516	1,040	202%	\$9,180
7/09/14	Sociedad Química y Minera vie Chile SA (ADS)	7/19/14	22,5	202	700	347%	\$17,652
7/09/14	Sociedad Química y Minera de Chile SA (ADS)	7/19/14	25	753	2,550	334%	53,233
7/09/14	Sociedad Quimics y Minera de Chile SA (ADS) YUM BRANDS INC.	7/19/14	20 70	62 917	102	165%	\$3,670 \$962
7/09/14	YUM BRANDS INC.	7/19/14	72.5	1,112	3,107	279%	\$1,981
7/09/14	YUM BRANDS INC	7/19/14	75	2,238	4,977	222%	\$2,072
7/09/14	YUM BRANDS INC.	1/17/15	50	133	440	331%	\$1,554
7/10/14	CBS Corporation CL B	7/19/14	57.5	882	896	102%	\$4,500
7/10/14	CBS Corporation CL B	1/17/15	40	645	1,290	200%	327,250
7/10/14	CBS Corporation CL B	1/17/15	42	197	A44	225%	\$5,350
7/10/14	Banco Santander S. A.	7/19/14	10	2,317	10,790	466%	\$5,860
7/10/14	Banco Santander S. A.	9/20/14	9	8,911	29,900	433%	518,011
7/10/14	Banco Santander S. A.	1/17/15	3	384	2,400	625%	\$6,115
7/10/14	Banco Santander S. A. Banco Santander S. A.	1/17/15	5	3,633	23,400	544% 658%	\$56,375
7/10/14	Bento Sentender S. A.	1/17/45	7	12,862 6,903	84,517 45,503	050%	\$173,216 \$105,329
7/11/14	AbbVie Inc.	B/18/14	45	382	1,045	274%	\$2,648
7/17/14	Abbyie Inc.	1/17/15	37.5	192	715	372%	\$6,048
7/11/14	AbbVie Inc.	1/17/15	40	780	2,145	276%	\$5,796
7/11/14	ABBOTT LABORATORIES	9/16/14	36	288	607	211%	8638
7/11/94	ABBOTT LABORATORIES	8/16/14	37	B90.	1,386	201%	31,474
7/11/14	ABBOTT LABORATORIES	1/17/15	25	2,968	16,500	556%	165,076
7/11/14	ABBOTT LABORATORIES	1/17/15	30	801	2,200	275%	\$5,170
7/11/14	BP PRUDHOE BAY ROYALTY TRUST	7/19/14	95	301	3,422	1137%	58 188
7/11/14	BP PRUDHOE BAY ROYALTY TRUST	0/20/14	85	85	717	1103%	88,491
7/11/14	BP PRUDHOE BAY ROYALTY TRUST FREEPORT MCMORAN COPPER - CL B	7/11/14	90 38	138 235	1,541	1117% 183%	\$18,073 \$2,344
7/11/14	FREEPORT MCMORAN COPPER - CL B	7/19/14	33	2,585	5,899	230%	\$3,313
7/11/14	FREEPORT MCMORAN COPPER - CL B	7/19/14	34	4,573	16,250	355%	518.435
7/11/14	FREEPORT MCMORAN COPPER - CL B	7/19/14	35	20,529	73,349	357%	\$341,686
7/11/14	FREEPORT MCMORAN COPPER - CL B	7/19/14	36	16,088	43,792	272%	\$10,406
7/11/14	FREEPORT MCMORAN COPPER + CL B	7/19/14	37	7,237	10,829	150%	\$11,938
7/11/14	FREEPORT MCMORAN COPPER - GL H	8/16/14	27	798	2,619	329%	59 406
7/13/14	FREEPORT MCMORAN GOPPER - GL B	8/16/14	28	484	1,570	324%	42,031
7/11/14	FREEPORT MCMORAN COPPER - CL R	B/15/14	58	640	2,090	327%	\$1,000
7/11/14	FREEPORT MCMORAN COPPER - CL B FREEPORT MCMORAN COPPER - CL B	8/16/14	30	1,308	4.603 26,156	352% 697%	88,000 88,988
7/11/14	FREEPORT MCMORAN COPPER-CL B	8/16/14	32	2,409	8,404	349%	\$3,908
7/11/14	FREEPORT MCMORAN COPPER - CL B	8/16/14	33	5,207	16,226	350%	\$11,875
7/11/14	FREEPORT MCMORAN COPPER - CL B	8/16/14	34	12,771	44,750	350%	817,000
7/11/14	FREEPORT MCMORAN COPPER - CL B	11/22/14	28	361	1,165	323%	\$1,594
7/11/14	FREEPORT MCMORAN COPPER - CL B	1/17/15	19	1,304	9,102	W864	540,219
7/31/34	FREEPORT MCMORAN COPPER - CL B	1/17/15	22	388	2,600	670%	\$5,750
7/19/14	FREEPORT MCMORAN COPPER - CL B	1/17/15	24	1,685	7,845	466%	\$29,688
7/11/14	FREEPORT MCMORAN COPPER - GL B	1/17/15	25	1,577	7,410	470%	\$7,531
7/11/14	FREEPORT MCMORAN COPPER - CL B	1/17/15	21	5,785	27,017	467%	\$37,531
7/11/14 7/11/14	FREEPORT MCMORAN COPPER - CL B FREEPORT MCMORAN COPPER - CL B	1/17/15	29	14,622	36,009 3,250	246% 863%	\$114,688 \$13,668
7/11/14	FREEPORT MCMORAN COPPER - CL B	1/16/16	23	288	1,950	677%	\$2,760
7/13/14	FREEPORT MCMORAN COPPER - CL B	1/15/16	25	1,701	6,130	478%	\$20,875
7/11/1=	GENERAL GROWTH PROPERTIES INC	7/19/14	23	2,172	5,410	249%	\$1,095
7/11/14	Harsco Corporation	7/19/14	25	237	240	701%	\$3,116
7/11/14	PNC FINANCIAL CORP.	8/16/14	72.5	156	440	262%	\$2,880
7/31/14	PNC FINANCIAL CORP.	B/16/14	75	214	615	287%	\$1,296
7/41/14	PNG FINANCIAL CORP.	B/16/14	77.5	332	880	265%	59,648
7/13/54	PNC FINANCIAL CORP	1/17/15	60	197	550	279%	16,240
7/41/14	PNC FINANCIAL CORP.	1/17/15	85	424	770	182%	\$5,904
7/14/14	CHESAPEAKE ENERGY CORP.	7/19/14	25	1,876	3,765	201%	\$6,484
7/74/14	CHESAPEAKE ENERGY CORP. CHESAPEAKE ENERGY CORP.	7/19/14	26 27	7,878 2,998	15,754 5,032	201%	\$31,929 \$14,070
7/14/14	CHESAPEAKE ENERGY CORP.	1/17/15	10	1,925	8,400	332%	512,924
7/14/14	Talwan Serolconductor Mfg. Co.	7/19/14	17.5	3,766	17,556	456%	\$49,580
7/14/14	Talwan Semiconductor Mfg. Co.	7/19/14	20	3,943	18,350	405%	\$11,492
7/14/14	Talwan Semiconductor Mig. Co.	7/19/14	21	2,768	12,952	4611%	\$4,265
7/14/14	Taiwan Semiconductor Mfg, Co.	10/18/14	17.5	511	2,617	428%	126,998
7/14/14	Telwan Semiconductor Mfg. Co.	10/18/14	19	120	140	117%	\$5,872
7/14/14	Taiwan Semiconductor Mfg, Co.	1/17/15	13	622	4,035	649%	\$12,746
7/14/14	Talwan Semiconductor Mlg. Co	2/17/15	17.5	5,179	18,217	352%	323,987
7/15/14	America Movil S.A.B. de C.V.	7/19/14	20	1.786	4.502	252% 254%	\$1,071
7/15/14	America Movil S.A.B. de C.V. America Movil S.A.B. de C.V.	7/19/1A 8/19/14	20	950 2,937	2,416 5,303	215%	\$9,046 \$1,477
	America Movil S.A.B. de C.V.	1/17/15	15	909	3,302	234%	52,271
1/1/2/14		- AALT/1010E		200	- I - DA	- T 10	and my
7/15/14 7/16/14		7/17/15	52.5	530	550	104%	\$2,088
7/16/14 7/16/14	COLIGATE PALMOLIVE FOOT LOCKER INC.	1/17/15 1/17/15	52,5 38	530 1,810	550 4,950	104% 273%	\$2,088 \$39,886

Es Dividend Date	Company	Expiration Date	Sloke	Open Interest Before Menipulation	One Days Ballogned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interest
7/16/14	PROCTER & GAMBLE	7/19/14	77.5	3,358	9,439	281%	811,542
7/16/14	PROCTER A GAMBLE	7/19/14	80	11,129	39,960	359%	£90,571
7/16/14	PROCTER & GAMBLE	7/25/14	60	2171	4,000	226%	\$2,188
7/16/14	PROCTER & GAMBLE PROCTER & GAMBLE	8/01/14	77.5	854 1,544	2,086 4,347	242% 282%	\$3,282 \$37,522
7/18/14	PROCTER & GAMBLE	1.0/18/14	76	1,323	2,846	215%	\$15,318
7/16/14	PROCTER & GAMBLE	1/17/15	69	999	4,610	461%	163, 137
7/18/14	PROCTER & GAMBLE	1/17/15	62,5	527	2,276	432%	\$2,446
7/16/14	PROCTER & GAMBLE	1/17/15	65	770	4,900	636%	\$36,170
7/16/14	PROCTER & GAMBLE	167/15	67.5 70	2,548	13,151 38.500	516% 465%	\$28,190
7/18/14	PROCTER & GAMBLE PROCTER & GAMBLE	1/17/15	80	8,272 286	1,300	455%	\$17,699
7/16/14	PROCTER & GAMBLE	1/15/16	66	6,111	30,566	500%	\$191,535
7/17/14	CATERPILLAR INC	7/19/14	97.6	818	2,072	351%	\$20,850
7/17/14	CATERFILLAR INC	7/19/14	(00	1,373	3,505	255%	\$3,710
7/17/14	CATERPILLAR INC	7/19/14	110	4,526	17,188	380%	\$32,200
7/17/14	CATERPILLAR INC	8/16/14	87,5 95	3,402	1,030	325% 352%	\$3,780 \$4,410
7/17/14	GATERPILLAR INC	8/19/14	97,5	1,591	5,116	384%	\$10,920
7/17/14	CATERPILLAR INC.	8/18/14	100	7,057	24,963	354%	\$14,280
7/17/14	CATERPILLAR INC	1/17/15	50	144	568	454%	17,960
7/17/14	CATERPILLAR INC	1/17/15	55	91	490	538%	\$4,270
7/17/14	CATERPILLAR INC	1/17/15	60 70	160	.725 928	453%	\$9,380 \$8,400
7/17/14	CATERPILLAR INC	1/17/15	75	520	2,380	460%	\$12,250
7/17/14	GATERPILLAR INC	1/17/15	80	2,757	12,920	489%	\$96,690
7/57/54	CATERPILLAR INC	1/17/15	82,5	1,185	5,608	473%	\$15,690
7/17/14	CATERPILLAR INC	1/17/18	85	4,480	15,703	351%	\$22,690
7/17/14	CATERPILLAR INC	1/15/18	55	67	380	567%	\$4,690
7/17/14	CATERPILLAR INC	1/15/16	65	274 75	T,165	426% 687%	\$18,970 \$5,250
7/17/14	CONOCOPHILLIPS	7/19/14	50	2,008	5,675	283%	\$2,117
70704	CONDCOPHILLIPS	7/19/14	82,5	2,537	5,785	228%	\$2,628
7/17/14	CONOCOPHILLIPS	7/19/14	85	18,509	46,179	249%	\$24,455
7/17/14	CONOCOPHILLIPS	7/25/14	84	302	664	230%	\$2,117
7/17/14	CONOCOPHILLIPS	8/16/14	70	360	982	273% 281%	\$4,453 \$13,359
7/17/14	CONOCOPHILLIPS	8/16/14	77.5	4,296 10,615	12,066 29,755	280%	\$5,037
7/17/14	CONOCOPHILLIPS	8/16/14	80	3.598	10.384	289%	\$31,755
7/17/14	CONOCOPHILLIPS	8/16/14	82.5	3,427	4,235	124%	\$29,857
7/17/14	CONOCOPHILLIPS	2/17/15	55	99	460	465%	\$5,329
7/17/14	CONOCOPHILLIPS	1/17/15	57,5	110	515	46646	\$5,913
7/17/14	CONOCOPHILLIPS	1/17/15	60	146	655 921	449% 451%	\$6,862 \$3,139
7/17/14	CONOCOPHILLIPS	1/17/15	62.5 65	581	2,869	511%	£14,985
7/17/14	CONOCOPHILLIPS	1/17/15	67.5	506	2,600	51446	612,921
7/17/14	CONOCOPHILLIPS	1/17/15	70	3,323	12,242	365%	537,376
7/17/14	CONOCOPHILLIPS	1/17/15	72.5	3,833	13,365	349%	\$25,185
7/17/14	CONOCOPHILLIPS	1/15/16	45 55	183	905 475	495%	\$13,359 \$3,504
7/17/14	CONOCOPHILLIPS	1/15/16	60	420	2,098	499%	128,105
7/17/14	CONOCOPHILLIPS	1/15/16	52.5	63	461	732%	\$2,190
7/17/14	CONOCOPHILLIPS	1/18/10	65	310	1,401	452%	813,359
7/17/14	CVS Caremark Corp	7/19/14	75	567	1,541	272%	5743
7/17/14	CVS Caremark Corp	8/16/14	70 85	875 2,133	5,996	127%	\$2,283 \$1,300
7/18/14	APACHE CORP	7/19/14	97.5	3,279	9.222	281%	\$1,425
7/18/14	APACHE CORP	7/19/14	90	4,836	13,711	284%	\$2,975
7/18/14	APACHE CORP	7/19/14	92.5	4,416	12,332	279%	31,200
7/18/14	APACHE CORP	7/18/14	95	4,499	12,689	282%	\$10,175
7/18/14	APACHE CORP	7/19/14	97,5	6.193	7,593	123%	\$39,150
7/21/14	LOWES COS	1/17/15	30 65	1,525	3,300 420	216% 180%	\$1,633 \$10,447
7/22/14	ROYAL BANK OF CANADA ROYAL BANK OF CANADA	10/18/14	60	233	490	233%	811,348
7/23/14	Teekay LNG Partners LP	8/16/14	42.5	310	320	10698	\$1,937
7/24/14	The Blackstone Group LP	7/25/14	35	554	1,287	229%	\$3,410
7/24/14	The Blackstone Group LP	8/16/14	33	1,176	4,145	352%	121,890
7/24/14	The Blackstone Group LP	8/16/14	31	4.633	13,490	29 (%	\$18,535
7/24/14	The Blackstone Group LP The Blackstone Group LP	9/20/14 9/20/14	25 26	164 169	33) 463	180% 256%	\$1,815 \$7,590
7/24/14	The Blackstone Group LP	8/20/14	27	BG	117	136%	\$2,970
7/24/14	The Blackstone Group LP	9/20/14	28	166	385	229%	86,930
7/24/14	The Blackstone Group LP	9/20/14	29	385	668	271%	\$11,385
7/24/14	The Blackstone Group LP	9/20/14	30	1316	3,600	289%	\$27,225
7/24/14	The Blackstone Group LP	9/20/14	31	5,086	14,316	282%	\$11,550 \$45,145
7/24/14	The Elackstone Group LP The Elackstone Group LP	9/20/14	32	10.067	28,300	281% 159%	\$46,145 \$59,015
7/24/14	The Blackstone Group LP	1/17/15	12	99	563	805%	\$2,475
7/24/14	The Blackstone Group LP	1/17/15	15	166	1,040	627%	\$7,205
7/24/11	The Blackstone Group LP	1/17/15	17	342	2,220	649%	\$17,820
7/24/14	The Blackstone Group LP	1/17/15	20	1.026	7,208	702%	\$41,890
7/24/14	The Blackstone Group LP	1/17/15	22	599	4,501	751% GDBM	\$22,320
7/24/14	The Blackstone Group LP The Blackstone Group LP	1/17/15	25	11,542	80,512 26,218	698W	\$69,850 \$105,490
7/24/14	The Blackstone Group LP	1/17/15	28	216	1,358	628%	\$6,855
7/24/14	The Blackstone Group LP	1/17/15	29	414	2,657	642%	\$17,600
7/24/14	The illackstone Group LP	1/16/16	16	34	38	704%	\$2,090
7/24/14	The Blackstone Group LP	1/15/18	16	34)	2,56	74894	\$18,755

E Dividend Date	Company	Expiration Date	Strike	Open Interest Before Manipulation	Dine Day's Ballooned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interest
7/24/14	The Blackstone Group LP	1/15/16	26	972	7,260	74776	852,085
7/24/14	The Blackstone Group LP	1/15/16	23	117	785	67136	35,940
7/24/14	The Blackstone Group LP	1/15/16	25	933 525	6,301 1,341	706% 265%	£46,915 \$850
7/24/14	CONAGRA FOODS INC	1/17/15	29 20	143	700	490%	¥3,575
7/24/1/	CONAGRA FOCOS INC	1/15/16	73	370	1,250	336%	\$7,725
7/20/14	El Paso Pipeline Partners LP	9/20/14	15	2,582	80,247	3108%	\$66,300
7/29/14	El Paso Pipeline Partners LP	9/20/14	30	224	1,440	643%	\$6,305
7/29/14	El Paso Pipeline Partners LP	9/20/14	32.5	775	5,090	657%	\$5,590
7/29/14	El Paso Pipeline Partners LP ENTERPRISE PROD PARTNERS L.PI	9/20/14	20 70	10,271 570	311,150	3029% 534%	\$667,095 \$4,392
7/29/14	ENTERPRISE PROD PARTNERS L.P.I	9/20/14	72.5	424	1,407	332%	\$4,176
7/29/14	ENTERPRISE PROD PARTNERS L.FI	1/17/15	45	261	1,986	761%	\$12,816
7/29/14	ENTERPRISE PROD PARTNERS L.FI.	1/17/15	50	119	845	710%	\$6,136
7/29/14	ENTERPRISE PROD PARTNERS L.FI	1/17/15	52.5	111	78E	707%	\$7,920
7/29/14	ENTERPRISE PROD PARTNERS L.PI	1/17/15	55 60	325 2,333	2,396 65,270	₹37% 2795%	\$22,752 \$148,608
7/29/14	ENTERPRISE PROD PARTNERS L.PI ENTERPRISE PROD PARTNERS L.PI	1/17/16	62.5	327	2,165	662%	\$18,072
7/29/14	ENTERPRISE PROD PARTNERS L.FI	1/17/15	65	550	3,575	650%	\$3,024
7/29/14	ENTERPRISE PROD PARTNERS LPI	1/17/16	67,5	256	1.631	640%	\$4,248
7/29/14	ENTERPRISE PROD PARTNERS LP)	1/15/16	50	100	850	650%	\$7,200
7/29/14	ENTERPRISE PROD PARTNERS LPI	1/15/16	50	187	1,190	636%	\$12,096
7/29/14	Goler LNG Partners LP	9/20/14	30 27.5	175	1,306 788	299%	\$1,697 \$5,031
7/29/14	Kinder Morgan Inc. Kinder Morgan Inc.	9/20/14	30	2,678	14,400	538%	\$108,575
7/29/14	Kinder Morgan Inc.	9/20/14	32.5	4,774	19,210	402%	35,149
7/29/14	Kinder Morgan Inc.	12/20/14	27.5	120	519	428%	\$4,945
7/29/14	Kindar Morgan Inc.	1/17/15	25	135	920	6B1%	\$3,053
7/29/14	Kinder Morgan Inc.	1/17/15	27.5	738	4,810	652%	\$17,114
7/29/14	Kinder Morgan Inc.	1/17/15	30 25	9,054	4,280	530% 648%	\$66,650 \$16,598
7/29/14	Rinder Morgan Inc. Kinder Morgan Inc.	1/18/16	27.5	602	3,900	648%	£10,684
7/29/14	KINDER MORGAN ENERGY PARTNERS	8/16/14	77.5	68	285	566%	\$4,855
7/29/14	KINDER MORGAN ENERGY PARTNERS	8/16/14	82.5	1,814	5,463	336%	\$28,356
7/25/14	KINDER MORGAN ENERGY PARTNERS	9/20/14	70	79	270	342%	\$3,753
7/29/14	KINDER MORGAN ENERGY PARTNERS	9/20/14	75	342	1,578	461%	\$9,750
7/29/14	KINDER MORGAN ENERGY PARTNERS KINDER MORGAN ENERGY PARTNERS	3/20/1A 1/17/15	80 70	5,092 309	17,812 2,019	350% 653%	\$26,688 \$26,410
7/29/14	KINDER MORGAN ENERGY PARTNERS	1/17/15	72.5	275	1,624	663%	\$14,039
7/29/14	KINDER MORGAN ENERGY PARTNERS	1/17/15	75	781	5,078	650%	852,284
7/29/14	KINDER MORGAN ENERGY PARTNERS	1/17/15	77 5	478	2,667	658%	\$27,661
7/29/14	KINDER MORGAN ENERGY PARTNERS	1/15/16	67.5	45	325	722%	\$3,753
7/29/14	KINDER MORGAN ENERGY PARTNERS	1/15/16	70	327	2,150	85754	531,631
7/29/14	KINDER MORGAN ENERGY PARTNERS	1/15/18	72.5	234 574	1,633 3,263	698% 567%	\$22,378 \$62,550
7/29/14	KINDER MORGAN ENERGY PARTNERS National Grid PLC	9/20/14	70	5,688	45,600	502%	456,381
7/29/14	OMEGA Healthcare Investors Inc.	9/20/14	36	1,926	4,812	250%	\$7,854
7/28/14	Prospect Capital Corporation	8/18/14	10	2,508	7,182	286%	\$13,114
7/29/14	Prospect Captial Corporation	11/22/14	10	9.205	21,247	231%	842,226
7/20/14	Prespect Capital Corporation	2/20/15	10	500	1,429	286% 250%	\$1,812 \$912
7/30/14	TO AMERITRADE HOLDING CORP Bank of Montreal	B/16/14 9/20/14	2B 70	671	2,300 2,238	287%	\$2.297
7/30/14	FORD MOTOR COMPANY	8/01/14	15.5	532	1,041	198%	\$388
7/30/14	FORD MOTOR COMPANY	8/01/14	17	926	2,110	229%	\$1,563
7/30/14	FORD MOTOR COMPANY	B/16/14	18	584	1,932	2311/6	5900
7/30/14	FORD MOTOR COMPANY	8/16/14	16	1,911	7,210	377%	\$13,338
7/30/14	FORD MOTOR COMPANY	9/16/14	18	6,921 536	24,568 1,780	355% 329%	\$13,100
7/30/14	FORD MOTOR COMPANY FORD MOTOR COMPANY	D/20/14	13	615	2.025	379%	\$5,075
7/30/14	FORD MOTOR COMPANY	9/20/14	14	2,811	10,230	352%	§19,325
7/30/14	FORD MOTOR COMPANY	9/20/14	15	14,748	51,542	349%	\$22,850
7/30/14	FORQ MOTOR COMPANY	12/20/14	14	940	1,710	182%	\$3,750
7/30/14	FORD MOTOR COMPANY FORD MOTOR COMPANY	1/17/15	B	250 3,093	1,625	650% 700%	\$2,763 \$37,675
7/30/14	FORD MOTOR COMPANY	1/17/15	10	7,537	52,795	700%	182,875
7/30/14	FORD MOTOR COMPANY	1/17/15	12	20,144	94,227	488%	\$189,250
7/30/14	FORD MOTOR COMPANY	1/15/16	8	679	4.415	650%	\$8,088
7/30/14	FORD MOTOR COMPANY	3/15/18	1.0		132,351	700%	\$217,600
7/30/14	Hi-Crush Partners LP	10/18/14	35	183	450	276%	\$7,590
7/30/14	HI-Crush Partners LP Legacy Reserves LP	10/18/14	40	280	710 120	254% 133%	\$6,670 \$2,440
7/30/14	PLAINS ALL AMERICAN PIPELINE LP	W/16/14 8/16/14	30 57.5	4,666	12,915	277%	310,772
7/30/14	PLAINS ALL AMERICAN PIPELINE LP	1/17/15	45	84	595	708%	\$4,580
7/30/14	PLAINS ALL AMERICAN PIPELINE LP	1/17/15	50	118	730	829%	\$2,387
7/30/14	PLAINS ALL AMERICAN PIPELINE LP	1/15/16	50		130	363%	52,322
7/30/14	PAYCHEX INC	1/17/15	35	1,102	3,025	275%	\$17,556 508,670
7/30/14	PETSMART Inc.	B/16/14 B/16/14	60 62.5	6,543 1,431	14,410 2,565	220%	398,670 \$507
7/30/14	PETSMART Inc. PEIZER	8/16/14	62.5 28	1,374	4,788	348%	\$9,152
7/30/14	PFIZER	9/20/14	21	361	1,595	283%	\$1,534
7/30/14	PFIZER	9/20/14	25	286	750	260%	\$4,602
7/30/14	PFIZER	1/17/15	50	1,359	9,595	706%	\$29,042
7/30/14	PRZER	1/17/19	22		6,400	700%	\$11,076
7/36/14	PFIZER	1/47/15	25		3,140	450% 664%	\$278,146 \$12,298
7/30/14	Williams Permera LP	9/20/14	50		2,210	383%	\$3,024
7/31/14	American Airlines Group Inc.	8/16/14	27	10,224	28,050	274%	\$100,170

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	7/31/14	American Aldinea Group, Inc.	8/16/14	31	1,145	2,850	249%	\$1,750
	7/31/14	American Airlines Group, Inc.	1/17/15	15	17,064	30,800	180%	\$10,460
	7/31/14	Acadia Research	8/16/14	15	1,089	2,160 650	108%	68,050 64,656
	7/31/14	Calumet Specialty Products Partners L.P. Calumet Specialty Products Partners L.P.	8(18/14	30	1,195	3,068	307%	\$19,356
	7/31/14	Enlink Midstream Partners LP	2/20/15	23	2,977	B,750	227%	\$103,478
	7/31/14	Energy Transfer Equity L.P.	8/16/14	45	259	700	260%	\$10,222
	7/31/14	Energy Transfer Equity L.P.	1/17/15	22.5	6,310	123,732	1961%	\$239,780
	7/31/14	Energy Transfer Equity L.P.	1/17/15	35 37.6	359 480	1,081	301% 275%	84,940 53,306
	7/31/14	Energy Transfer Equity L.P. Energy Transfer Equity L.P.	1/15/16	27.5	129	480	372%	\$4,902
	7/31/14	Energy Transfer Equity L.P.	1/15/16	30	335	1,210	361%	312,654
	7/31/14	Eston Corporation ple	1/15/18	40	122	603	494%	\$1,470
	1/31/14	Energy Transfer Partners LP	9/20/14	52.5	128	495	387%	\$2,674
	7/31/14	Energy Transfer Partners LP	3/20/14	55	1,593	5,208 850	327% 633%	\$8,309 \$7,449
	7/31/14	Energy Transfer Partners LP Energy Transfer Partners LP	1/17/15	42.5 45	182	1,255	890%	316,235
	7/31/14	Energy Transfer Partners LP	1/17/15	47.5	138	990	717%	\$11.842
	7/31/14	Energy Transfer Partners LP	1/17/15	50	225	7,540	564%	518,145
	7/31/14	Energy Transfer Partners LP	1/17/15	52.5	538	2,235	350%	537,818
	7/31/14	Energy Transfer Partners LP	1/15/16	45	120	785	054%	\$11,460
	7/31/14	Holly Energy Panners LP KKR & Co. LP	8/16/14	30 20	151 98	865 650	440% 677%	\$3,399 \$2,211
	7/31/14	KKR & Co. LF	9/20/14	23	883	2,873	325%	811,457
	7/31/14	KKR & Go. LP	12/20/14	20	119	860	555%	\$6,432
	7/31/14	KKR & Co. LP	1/17/15	15	306	2,285	742%	\$19,698
	7/31/14	KKR & Co. LP	1/17/15	17	71	650	915%	\$5,350
	7/31/14	KKR & Co. LP KKR & Co. LP	1/17/15	20	689 83	4,780	894% 651%	\$42,947 \$5,494
	7/31/14	KKR & Co. LF	1/15/16	18	85	598	701%	13,896
	7/31/14	KKR & Gg. LP	1/15/16	20	423	125	100%	\$26,867
	7/31/14	LAZARD LTD.	8/16/14	50	490	1,193	243%	\$3,900
	7/31/14	DNEOK Partners LP.	10/18/14	50	128	320	250%	\$2,508
	7/31/14	SOUTHERN CO	8/16/14 8/16/14	41	116	385 390	332% 308%	\$6,038 \$3,990
	7/31/14	SOUTHERN GO SOUTHERN GO	1/17/15	42	216	771	357%	\$5,145
	8/04/14	Emerga Energy Services LP	8/16/14	95	451	900	200%	551,597
	8/04/14	Emerge Energy Services LP	9/20/14	50	72	496	589%	\$6,084
	8/04/14	Emerge Energy Services LP	9/20/14	60	52	325	625%	14,563
	B/04/14	Emerge Energy Services LP	9/20/14	65	440	1,895	431%	\$14,525
	8/04/14	Emerge Energy Services LP Emerge Energy Services LP	9/20/14 8/20/14	70 80	107	1,350	428% 328%	\$8,692 \$5,499
	8/04/14	Emerge Energy Services LP	12/20/14	65	198	920	465%	\$10,178
	8/04/14	NuStar Energy LP	9/20/14	55	6,426	19,200	299%	\$111,909
	9/04/14	NuStar Energy LP	1/15/16	50	198	1/100	556%	\$3,614
	8/05/14	Atlas Pipelino Pariners L.P.	1/17/15	25	86	553	2008	\$4,168
	B/05/14 B/05/14	Atlas Pipeline Penners LP.	8/08/14	32.6	400 470	1,430	358%	\$15,676 \$608
	8/05/14	INTEL CORPORATION	8/16/14	27	20,320	71,218	350%	\$2,160
	8/05/14	INTEL CORPORATION	8/16/14	28	23,873	84 079	352%	\$1,778
	8/05/14	INTEL CORPORATION	8/16/14	28	3,277	6,766	206%	\$1,823
	8/05/14	INTEL CORPORATION	8/16/14	30	17,175	60,261	351%	\$5,040
	8/85/14 8/85/14	INTEL CORPORATION	8/16/14	31	8,729 16,787	19,219 47,264	220% 282%	\$9,750 571,460
	8/85/14	INTEL CORPORATION INTEL CORPORATION	8/22/14	31.5	925	2,870	224%	\$608
	8/05/14	INTEL CORPORATION	B/22/14	32	1,386	2,515	781%	\$675
	8/05/14	INTEL CORPORATION	9/20/14	27	10,909	35,062	321%	\$743
	8/05/14	INTEL CORPORATION	8/20/14	29	6,344	14/162	223%	53,240
	8/05/14	INTEL COPPORATION	9/20/14	29	15,974	45,183	263% 260%	\$1,553 \$24,075
	8/05/14	INTEL CORPORATION	9/20/14	30 23	3,967 2,815	9,935 7,003	268%	\$698
	B/05/14	INTEL CORPORATION	10/18/14	25	8,811	14,363	163%	\$1,866
	8/05/14	INTEL CORPORATION	10/18/14	26	20,341	29,813	147%	#2,048
	8/05/14	INTEL CORPORATION	10/10/14	27	26,812	74,547	278%	\$26,280
	8/05/14	INTEL CORPORATION	10/18/14	28	24,247	42,159	174%	\$3,015 \$923
	8/05/14 8/95/14	INTEL CORPORATION	1/17/15	10	187 7,369	1,165	623% 717%	529,048
	8/05/14	INTEL CORPORATION	1/17/15	19	1,931	13,035	700%	\$29,296
	0/05/14	INTEL CORPORATION	1/17/15	20	6,208	43,420	599%	\$78,45E
	8/08/14	INTEL CORPORATION	1/17/15	22	24,562	114,898	468%	\$97,695
	8/05/14	INTEL CORPORATION	1/17/15	24	513	1,075	365%	\$3,623
	8/05/14	INTEL CORPORATION INTEL CORPORATION	1/17/15	25 26	70,254 3,952	246,635	351% 102%	\$187,313 \$608
	8/05/14	INTEL CORPORATION	1/15/16	75	565	3,250	588%	\$6,030
	8/05/14	INTEL CORPORATION	1/15/16	18	1,336	9,275	595%	\$19,395
	8/05/14	INTEL CORPORATION	1/15/16	50	4,804	Z2,410.	456%	\$48,623
	8/05/14	QR Energy LP	8/16/14	17.5	334	390	296%	\$2,356
	8/05/14	OR Energy LP	11/22/14	17.5	1,049	2 354	224%	\$10,806
	8/05/14 8/05/14	STARBUCKS CORP	8/16/14	62.5 72.5	249 862	715	287% 271%	\$2,600 \$3,328
	8/05/14	Skyworks Solutions Inc	8/16/14	35	881	450	99%	\$2,046
	8/05/14	Skyworks Solutions Inc.	8/16/14	36	579	704	104%	\$759
	8/05/14	Skyworks Solutions Inc.	8/18/14	38	264	275	104%	\$1.254
	8/05/14	Skywarks Solutions Inc	8/16/14	40	506	500.	99%	\$2,024
	6/05/14	Skyworks Solutions Inc	8/16/14	43	499	580	110%	8451
	g/motes.	Assertions Destin Family Comments a los	9 200 00 10 200 10	4.75	35 to 4	ann	2200	egen
	8/06/14 8/08/14	American Really Capital Properties Inc. American Really Capital Properties Inc.	10/18/14	10 TU	39.1 1,971	900 2,430	230% 227%	\$250 \$470,839

E> Dividend Date	Company	Expiration Clate	Strike	Open Interest Before Manipulation	One Day's Ballooned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interest
6/06/14	BOEING CO	6/16/14	100	389	1,191	323%	820,221
8/06/14	EUEING CO	R/16/14	110	199	560 981	332%	\$5,110
9/06/14 9/06/14	BOEING CO	8/16/14 1/17/15	115	73	650	346% 690%	\$3,796 \$3,139
0/05/14	BOEING CO	1/17/15	75	289	1,895	658%	\$20,221
8/08/14	BOEING CO	1/17/15	80	165	1,071	549%	\$5,913
8/06/14	BOEING CO	1/18/16 B/18/14	85 47	69 109	851 460	943% 422%	\$3,431 \$5,850
B/06/14 B/06/14	3P PLC 3P PLC	1/17/15	30	243	3,195	1315%	\$14,040
8/06/14	ap PLC	1/17/15	33	473	6,175	1305%	\$26,810
8/05/14	RP PLC	1/17/15	35	519	5,770	1304%	\$13,631
8/06/14	BP PLC	1/17/15	-38	4,736	88,295	1400%	\$275,360
8/06/14 8/06/14	BR PLC BR PLC	1/17/15	40	4,216 832	59,041 5,830	1400% 701%	\$370,188 \$129,402
5/05/14	BP PLC	1/15/15	35	634	8,895	1403%	162,537
8/06/14	3P PLC	1/15/16	49	4,851	33,332	687%	51,335,614
6/06/14	Cal-Maine Foods Inc.	8/16/14	60	225	495	220%	\$7,378
8/06/14	EV Energy Partners ILP. GLAXOSMITHKLINE PLC	1/17/16	40	377	1,710 BEÓ	454%	\$12,059 \$21,715
8/08/14	GLAXOSMITHKLINE PLC	1/15/18	40	109	497	460%	158,904
8/08/14	INTL BUSINESS MACHINE	9/08/14	185	134	246	184%	\$9,790
8/06/14	INTL BUSINESS MACHINE	B/16/14	175	237	650	274%	\$5,720
8/06/14	INTL BUSINESS MACHINE	6/16/14	180	513	1,072	209%	\$11,550
6/06/14	INTL BUSINESS MACHINE METLIFE INC.	1/17/15	140	193	1,650	435% 537%	\$13,420 \$10,325
3/06/14	METUFE INC.	1/17/15	135	326	1,210	371%	\$3,955
8/05/14	NEW YORK COMM, BANGORP	1/17/18	12	856	3,870	452%	321,400
8/06/14	SEAGATE TECH PLC (IRL)	9/16/14	50	202	580	287%	\$4,730
8/06/14	SEAGATE TECH PLC (IRL) SEAGATE TECH PLC (IRL)	9/20/1A 1/17/15	20	171	495 550	289% 539%	\$2,150 \$4,386
0/06/14	Sunoco Logistics Partners L.P.	8/16/14	42.5	198	400	201%	\$3,285
8/05/14	UNILEVER N.V.	8/16/14	30	200	400	200%	\$7,684
8/06/14	WELLS FARGO & CO	8/10/14	35	214	712	333%	35,530
0/06/14 9/06/14	WELLS FARGO & CO WELLS FARGO & CO	10/18/14 1/17/16	20	284 143	922	325% 643%	\$9,555 \$4,085
8/06/14	WELLS FARGO & CO	1/17/15	25	1,462	10,214	599%	143,085
9/05/14	WELLS FARGO & CO	1/17/15	28	147	975	663%	\$4,620
8/06/14	WELLS FARGO & CO	1/17/15	30	1,761	12,335	700%	\$55,475
8/06/14	WELLS FARGO & CO	1/17/15	33	2,159	14,845	688%	158,415
8/06/14 8/06/14	WELLS FARGO & CO WELLS FARGO & CO	1/17/15	35	1,176	8,265 8,445	702% 709%	\$39,130 810,780
8/06/14	WELLS FARGO & CO	1/15/18	25	96	650	677%	\$3,570
8/06/14	WELLS FARGO & CO	1/15/16	30	592	4,203	710%	\$20,475
8/06/14	WAL-MART STORES INC	9/20/14	65	3,059	10,725	351%	\$3,188
9/06/14	WAL-MART STORES INC.	1/17/16	65 50	1,192	1,435	706% €32%	\$5,280 \$4,272
8/06/14	WAL-MART STORES ING	7/15/16	50	164	1,039	632%	\$7,008
9/07/14	Apple Inc	0/08/14	79	217	633	292%	\$9,570
6/07/14	Apple Inc.	8/08/14	85	305	783	257%	\$1,927
8/07/14	Apple Inc.	B/08/14 B/08/14	88	263 222	680	259% 252%	\$2,068 82,068
B/07/14	Apple Inc	8/08/14	90	1,089	3,023	278%	\$26,320
8/07/14	Apple Inc	5/08/14	9.9	893	2,593	291%	821,150
8/07/14	Apple Inc	57/08/14	92	1,897	5,961	314%	\$35,626
B/07/14 B/07/14	Apple Inc.	D/08/14 B/08/14	93	2,452 B,231	5,748 9,834	395%	\$48,316 \$447,346
9/07/14	Apple Inc	8/16/14	65	131	364	278%	\$4,888
9/07/14	Apple Inc	0/16/14	67.14	392	711	202%	316,544
8/07/14	Apple Inc	6/16/14	70	149	417	260%	\$1,786
8/07/14 8/07/14	Apple that	8/16/14 8/16/14	71.43 72.66	2,039 480	14,004	687% 240%	\$56,259 \$3,290
8/07/14	Apple Inc	8/16/14	75	657	1,653	236%	\$6,815
8/07/14	Apple Inc	8/16/14	77,14	2,463	2,522	1025%	\$10,340
8/07/14	Apple Inc.	6/16/14	78.57	5,033	30,963	618%	\$16,403
9/07/14 9/07/14	Apple Inc	M/16/14 B/16/14	00.71	2,652 2,446	8,300 2,934	238% 120%	\$1,114
B/07/10	Apple Inc	B/16/14	81.43	4,963	7,290	147%	\$9,447
9/07/14	Apple Inc	8/16/14	82,14	5,957	16,749	281%	\$9,964
8/07/14	Apple Inc	9/18/14	82.86	7,769	1 t, DER	14216	313,442
8/07/14	Apple Inc	8/16/14 8/16/14	83.57	14,496 9,508	17,191	119%	\$6,345 \$107,489
8/07/14	Apple Inc.	B/16/14	85.71	14,168	70,190	495W	369,748
8/07/14	Apple Inc.	8/16/14	86	637	1,731	272%	\$2.481
8/07/14	Apple Inc	8/16/14	86,43	3,614	6,240	173%	811,750
8/07/14	Apple Inc	6/16/14	87.14	4,372	8,284	189%	313,254
B/07/14 B/07/14	Apple Inc. Apple Inc	8/18/14 8/16/14	87,86 88,57	2,851 14,422	3,569 25,291	125% 175%	\$11,844 \$39,950
8/07/14	Apple Inc	B/16/14	89.29	14,691	30,671	210%	\$92,77B
8/07/14	Apple Inc	B/16/14	90	29,766	53,608	160%	\$701,267
8/07/14	Apple Inc	8/22/14	95	891	2,713	304%	\$1.551
8/07/14	Apple Inc. Apple Inc.	8/22/14 8/22/14	86	415 222	1,450 261	305% 118%	\$9,400 \$3,807
8/07/14	Apple Inc	8/29/14	85	156	181	116%	84.183
8/07/14	Apple Inc	9/20/14	75	121	171	141%	54,888
8/07/14	Apple Inc	9/20/14	80	2,284	3,477	152%	\$86,924
8/07/14	Apple Inc	10/18/14	42,56	117	250	214%	\$5,498
8/07714	Apple inc	10/35/34	57.14	1,294	8,305	335%	\$18,424

Es Dividend Date	Cumpany	Expiretion Date	Suka	Open Interest Before Manipuletion	One Days Ballooned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interest.
8/07/14	Apple Inc.)0/18/14	64 29	3,421	41,234	1205%	\$142,739
8/07/14	Apple Inc	10/18/14	65	338	1,625	481%	\$13,254
B/07/14 B/07/14	Apple Inc.	10/18/14	65,71 66,43	486 344	1,771	184% S15%	\$15,639
8/07/14	Apple Inc	10/18/14	57,14	611	2,950	483%	\$4,982 \$15,839
8/07/14	Apple Inc	16/18/14	67.86	256	950	244%	611,045
9/07/14	Apple Inc	10/18/14	88.57	570	1,788	314%	\$8,413
8/07/14	Apple Inc	10/18/14	66.29	299	725	242%	\$13,395
8/07/14	Apple Inc	10/18/14	70.71	1,583	4,300	258% 258%	522,889
8/07/14	Apple Inc.	10/18/14	71.43	20,965	2,900	397%	\$2,256 \$185,744
8/07/14	Apple Inc	10/18/14	72.66	7,611	11,925	167%	\$39,574
B/07/14	Apple Inc.	10/18/14	73.57	2,920	4,895	169%	815,745
8/07/14	Apple inc	10/18/14	74.20	8,404	13,325	159%	842,582
9/07/14	Apple Inc	10/18/14	75	7,518	10,879	145%	\$142,457
8/07/14	Apple Inc. Apple Inc.	1/17/15	28.57	406 933	1,050 8,125	259% 871%	\$13,207 \$17,954
B/07/14	Appla Inc	1/17/15	37.14	764	5,625	736%	315,369
9/07/14	Apple Inc.	1/17/15	36.57	486	1,200	658%	\$5,734
B/07/14	Apple Inc.	1/17/15	40	194	1,200	619%	35,123
B/07/14	Apple Inc	1/17/15	42.86	9,839	111,942	1138%	\$290,930
8/07/14	Apple Inc. Apple Inc.	1/17/15	44.29	316 852	2.325 3.900	736% 596%	\$5,922 \$15,228
8/07/14	Apple Inc	1/17/15	47.14	585	3,550	EQ7%	511,609
8/07/14	Apple Inc.	1/17/15	40.57	560	3,350	598%	\$1,551
5/07/14	Apple Inc.	1/17/15	50	7,087	74,285	1048%	\$267,430
B/07/1A	Apple Inc	1/17/15	51.43	602	4,600	764%	\$16,450
8/07/14 B/07/14	Apple Inc	1/17/15	52.86 53.57	1,429 675	9,290 4,415	650% 654%	\$31,114 \$18,283
8/07/14	Apple Inc. Apple Inc.	1/17/15	54.29	818	6.655	814%	818,585
8/07/14	Apple Inc	1/17/15	55	221	1,325	600%	\$7,097
8/07/14	Apple Inc	1/17/15	55,71	522	3,125	599%	\$14,241
8/07/14	Apple Inc	1/17/15	56,43	365	2,225	510%	\$5,170
8/07/14	Apple Inc	1/17/15	57.14	35,296	360,782	1022%	\$1,009,043
9/97/14	Apple Inc. Apple Inc.	1/17/15 1/17/15	57.86 58,57	2,058 2,673	17,380 17,451	645% 653%	\$20,022 \$30,266
8/07/14	Apple Inc	1/17/15	59,29	2,308	15,005	650%	\$6,674
8/07/14	Apple inc	1/17/15	60	5,199	56,300	687%	\$106,408
8/07/14	Apple Inc	1/17/15	60.71	2,316	15,015	648%	843,616
8/07/14	Apple Inc	1/17/15	61,43	5,735	43,822	651%	\$184,193
8/07/14 8/07/14	Apple Inc	1/17/15	62,14	13,446	5,447 104,500	656% 777%	\$10,998
8/07/14	Apple Inc	1/17/15	82.57	872	5,678	651%	\$7,285
8/07/14	Apple Inc	1/17/15	84.29	42,339	277,915	856%	\$1,106,260
8/07/14	Apple inc	1/17/15	65	1,576	8,774	430%	\$21,056
8/07/14	Apple Inc	1/17/15	65.71	10,958	46,628	426%	\$175,498
8/07/14	Apple Inc Apple Inc	1/17/15	66,43	8,356 16,459	20,255 64,195	350% 348%	\$30,080 \$85,587
8/07/14	Apple Inc	4/17/15	55	222	900	405%	\$10,528
8/07/14	Apple inc	4/17/15	60	856	2,660	399%	\$28,482
8/07/14	Apple Inc	1/15/18	34.29	538	4,250	760%	\$23,641
8/07/14	Apple inc	1/15/46	40	100	600	600%	\$3,431
8/07/14	Apple Inc Apple Inc	1/15/16	44.29	2,627 177	27,645 1,075	978% 507%	\$88,924 \$6,439
8/07/14	Apple inc	1/15/16	45.71	467	9,450	708%	\$11,132
8/07/14	Apple Inc	1/15/16	47.14	310	2,350	758%	\$24,769
8/07/14	Apple Inc	1/15/16	50	2,909	28,358	975%	\$109,235
8/07/14	Apple Inc	1/15/10	51.43	224	1,375	01496	15,828
8/07/1€	Apple Inc	1/15/16	52.86	162	950	566%	\$6,298
8/07/14	Apple Inc	1/15/16	54.29 55.71	886 361	4,395 2,150	496% 596%	\$40,514 \$15,181
8/07/14	CVR Refining LP	1/15/16	20	43	424	986%	\$5,260
9/07/14	Externa Holdings Inc.	8/16/14	40	1,981	3,130	156%	\$780
8/07/14	Health Cara REIT Inc.	9/20/14	55	154	500	325%	512,164
8/07/14 5/07/14	HOP the	8/16/14	49 20	1,616	6,766 665	418%	111,500
8/07/14	Linn Energy LLC-Units Linn Energy LLC-Units	1/17/15	25	196 990	4,255	430%	\$111,450 \$49,770
5/07/14	Linn Energy LLC-Units	1/15/16	23	554	2,410	435%	\$31,239
8/07/1≉	Unn Energy LLC-Units	1/15/10	25	387	1,430	370%	\$27,953
9/07/14	Linn Co. LLC	1/15/16	23	285	1,045	367%	\$24,474
8/08/14	WYNN RESORTS LIMITED	1/17/15	122	116	867	575%	813,125
8/11/14	CON EDISON CON EDISON	8/16/14 8/16/14	52.5 55	100 2,422	352 7,214	352% 298%	\$2,709 \$3,717
9/11/14	CON EDISON	1/17/15	50	495	1,259	254%	\$3,024
8/11/14	UNITED STATES STEEL	5/16/14	24	592	600	WIGH.	\$145
8/11/14	UNITED STATES STEEL	8/16/14	25	973	1,005	103%	\$715
8/11/14	EXXON MOBIL CORP	8/16/14	97.5	1,951	3,449	177%	\$9,729
8/11/14	EXXON MOBIL CORP EXXON MOBIL CORP	1/47/45	70	185	1,165	630% 677%	\$12,489 \$7,659
8/11/14	EXXON MOBIL CORP	1/17/15	88	1,539	7,209	408%	894,675
8/11/14	EXXON MOBIL CORP:	10 5/16	50	6,124	85.750	1400%	\$422,349
8/12/14	AMGEN	8/18/14	120	2,775	5,198	187%	\$7,198
8/12/14	AMGEN	1/17/15	80	239	880	368%	\$6.466
8/12/14	Boardwalk Pipline Pertners LP	9/29/14	18	316	100	127%	\$820
5/12/14 5/12/14	Boardwalk Pipline Partners LP Boardwalk Pipline Partners LP	1/17/15	12.5	7,066	19,375	27416	\$5,990 \$2,970
8/12/14	SandRidge Mississippion Trust II	9/20/1A	8.9	421	1,460	346%	54,753
9/12/14	SendRidge Mississippion Trust II	12/20/14	3	1.386	16,54m	1195%	35,681

Ex Dividend Date	Compeny	Expiration Date	Strike	Open Interest Before Manipulation	One Day's Ballogned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Phyments to Open Interest
6/12/14	TJX COMPANIES INC.	8/16/14	52.5	2,585	5,123	198%	\$3,675
B/13/14	Cliffs Natural Resources Inc	8/16/14	15	1,834	4,255	232%	\$1,920
8/13/14	Cliffs Natural Resources Inc	9/16/14	16	2,747	8,967	254%	82,925
8/13/14	Cliffs Natural Resources Inc.	8/16/14	16.5	940	1,820	194%	87 005
8/13/14	DUPONT	8/16/14	63	119	335	282%	81,645
8/13/14 8/13/14	DUPONT	1/17/16	30 50	69 23B	350 880	797% 370%	\$3,196 \$3,525
8/13/14	EXELON CORPORATION	8/16/14	31	804	1,657	274%	\$2,201
8/13/14	EXELON CORPORATION	1/17/15	25	373	1,375	369%	\$3,255
9/13/14	EXELON CORPORATION	7/15/16	20	120	715	554%	5961
8/13/14	ELI LILLY & CO	8/15/14	60	1,622	4,471	276%	\$2,155
8/13/14	ELILLYACO	1/17/16	45	147.	825	561%	\$6,272
8/13/14	ELI LILLY & CG	1/17/15	50	683	1,825	267%	\$5,430
8/13/14	Nexstar Broadcasting Group Inc.	8/18/14	40	445	850	198%	\$5,715
8/19/14	Phillips 66	3/16/14	75	829	1,015	219%	\$2,050
8/13/14	Phillips 66	B/16/14	77.5	1,322	3,705	280%	\$2,050
B/13/14	Phillips 66	8/16/14	80	7,839	7,912	101%	\$14,250
8/13/14	Phillips 66	1/17/15	60	216 1,734	805 6,350	280% 367%	\$2,850 86,229
8/13/14 8/13/14	RIO TINTO PLC ADS RIO TINTO PLC ADS	1/17/15	57.5 40	127	840	861%	\$10,446
8/13/14	RIO TINTO PLC ADS	1/17/15	45	343	1,490	434%	\$18,784
8/13/14	RIO TINTO PLC ADS	1/15/18	30	107	705	659%	\$9,584
8/13/14	SOUTHERN COPPER CORPORATION	8/16/14	37	5,209	7,204	138%	\$6,900
8/13/14	UNITED TECHNOLOGIES	8/18/14	100	164	260	220%	54,012
8/13/14	Visa Inc.	8/16/14	180	140	315	225%	\$1,600
8/14/14	AMERISOURCESERGEN CORP.	8/18/14	75	20,557	24,246	118%	\$3,079
8/14/14	Alon USA Partners LF	8/16/14	17.5	594	1,230	207%	\$637
5/14/14	OF Industries Holdings (no.	8/16/14	220	131	440	336%	\$15,000
8/14/14	CF Industries Holdings Inc	8/16/14	235	152	680	434%	\$4,950
8/14/14	The GEO Group Inc.	9/20/14	35 75	1,131 55	≥,843 380	251 W. 691 W.	\$46,227 \$8,250
9/14/14	Icahn Enterprises LP	9/20/14	90	68	463	702%	\$4,050
8/14/14	loahin Enterprises LP	9/20/14	100	424	1,639	387%	\$28,600
8/14/14	L-3 COMMUNICATIONS	8/16/14	100	469	1,150	245%	\$2,100
8/14/14	Northstar Realty Finance Corp.	8/16/14	17	2,201	13,200	600%	\$8,000
8/14/14	Northstar Realty Finance Corp.	9/20/14	14	10,073	21,000	206%	\$10,100
0/14/14	Northstar Realty Finance Corp.	9/20/14	15	12,568	86,770	690%	\$24,200
0/14/14	Northstar Realty Finance Corp.	9/20/14	16	15,700	32,908	210%	191,150
0/14/14	Northstar Realty Finance Corp	9/20/14	17	2,738	19,100	701%	\$26,000
9/14/14	Northstar Really Finance Corp.	1/17/16	10	702	4,590	648%	\$30,400
8/14/14	Northstar Realty Finance Corp.	1/17/15	12	1,200 553	6,400 3,830	700% 696%	\$59,200 \$24,350
8/14/14	Northstar Realty Finance Corp. Northstar Realty Finance Corp.	1/15/16	12	989	7,000	70B%	\$31,450
8/14/14	Northern Tier Energy Inc.	8/18/14	25	716	1,463	204%	\$3,445
8/14/14	QIWI PLC	8/16/14	30	297	BOA	272%	\$1,188
3/14/14	SouFun Holdings Ltd	8/18/14	8	216	430	200%	\$3,990
0/14/14	SeuFun Holdings Ltd	8/16/14	10	1,268	4,250	335%	\$2,585
8/14/14	SpuFun Holdings Ltd	8/16/14	10.5	563	4,9930	337%	\$1,539
8/14/14	SouFun Holdings Lld	3/16/14	11	2,894	10,044	335%	\$9,766
6/14/14	TIM HORTONS	8/16/14	60	452	1,156	256%	\$4,226
9/14/14 0/14/14	TIM HORTONS	10/18/14 B/16/14	45	414	1,000	242% 359%	\$9,831 \$9,950
8/14/14	Tronox Ltd. Tronox Ltd.	8/16/14	28	1,893	6,360	337%	\$40,000
8/14/14	Tronox Ltd.	8/16/14	26	1,805	5,500	366%	\$25,000
3/14/14	Tronox Ltd.	8/18/14	27	648	1,596	246%	\$3,750
8/14/14	UNITED PARCEL SERVICES	9/26/14	90	147	175	119%	\$4,623
8/14/14	UNITED PARCEL SERVICES	1/17/15	72.5	206	1,165	561%	611,725
8/14/14	UNITED PARCEL SERVICES	1/17/15	80	1,140	2,015	256%	574,038
B/15/14	CHEVRON CORP	8/15/14	124	150	457	305%	85,350
B/15/14	CHEVRON CORP	8/16/14	125	2,298	8,054	350%	148,150
B/15/14	CHEVRON CORP	9/20/14	115	257	840	327%	\$3,636 \$9,095
8/15/14 8/15/14	CHEVRON CORP	9/20/14	120	6,804 321	13,264	195% 667%	\$20,865
8/15/14	CHEVRON CORP	1/17/15	105	173	1,245	720%	\$14,231
8/15/14	CHEVRON CORP	1/15/16	80	90	433	544%	\$14,338
8/15/14	SFDR DJIA ETF Trust	8/16/14	166	3,633	4,322	119%	\$8,629
8/15/14	Whiting USA Trust I	9/20/14	2	529	5,493	1038%	\$1,982
8/18/14	TARGET CORPORATION	10/18/14	50	195	650	282%	\$2,850
8/18/14	TARGET CORPORATION	1/17/15	40	100	650	650%	\$2,392
8/18/14	TARGET CORPORATION	1/17/15	45	156	805	388%	\$2,600
8/18/14	TARGET CORPORATION	1/15/18	40	142	450	31764	\$8,320
9/18/14	VALERO ENERGY CORP.	9/20/14	40	144	245	170%	\$1,018
8/18/14	VALERO ENERGY CORP.	9/20/14	25	2,105	7,700	355%	\$3,740 \$2,088
8/19/14 3/19/14	ARCHER DANIELS MIDLAND CO ARCHER DANIELS MIDLAND CO	1/17/15	48 35	1,107	2,750	248%	\$1,440
8/19/14	APPLIED MATERIALS INC.	1/17/15	10	753	1,500	199%	\$7,240
3/19/14	HONEYWELL INTL INC (NEW)	9/20/14	80	214	560	262%	\$5,580
3/19/14	HONEYWELL INTLING (NEW)	9/20/14	85	158	440	278%	\$1,530
8/19/14	SOUTHWEST AIRLINES COMPANY	9/20/14	22	1,470	2,420	165%	\$1,458
3/19/14	MICROSOFT CORPORATION	6/22/14	42	506	613	121%	52,100
3/19/14	MICROSOFT CORPORATION	8/22/14	-53	1,795	4,178	233%	\$13,468
8/19/14	MICROSOFT CORPORATION	8/22/14	43.5	2,699	0,305	345%	\$9,380
9/19/14	MICROSOFT CORPORATION	8/22/14	44	13,408	33,478	250%	\$10,752
3/19/14	MICROSOFT CORPORATION	8/22/14	44.5	4,188	5,084	121% 227%	\$19,264 \$1,464
3/19/14 3/19/14	MICROSOFT CORPORATION MICROSOFT CORPORATION	8/29/14	43.5	1,044	7,810 2,350	227%	\$3,246
9/19/14	MICROSOFT CORPORATION	9/20/14	30	408	7,030	252%	5241

Ex Dividend Date	Company	Expiration Date	Strike	Open Interest Before Manipulation	One Day's Beliconed Volume	Increase in Open Interest Following Manipulative Trading	Dividend Paymonts to Open Interest
9/19/14	MICROSOFT CORPORATION	9/20/14	38	651	1,880	258%	\$2,184
5/19/14	MICROSOFT CORPORATION	9/20/14	39	539	1.571	291%	\$1,176
8/19/14	MICROSOFT CORPORATION	9/20/14	40	2,769	9,274	935%	57,644
8/19/14	MICROSOFT CORPORATION	₩20/14	- 41	3,807	9,923	261%	\$8,484
6/19/14	MICROSOFT CORPORATION	9/20/14	42	10,230	ZB,4Z3	2789	\$14,612
B/19/54	MICROSOFT CORPORATION	10/18/14	30 32	308 172	785	255% 119%	\$1,648 \$2,772
8/19/14	MICROSOFT CORPORATION	10/18/14	33	228	161	202%	\$1,960
8/19/14	MICROSOFT CORPORATION MICROSOFT CORPORATION	10/15/14	35	1,795	5.74%	324%	\$13,692
5/19/1A	MICROSOFT CORPORATION	10/18/14	37	3,660	9,594	262%	\$13,868
9/19/14	MICROSOFT CORPORATION	10/18/14	36	3,883	10,082	261%	\$5,908
8/19/14	MICROSOFT CORPORATION	10/38/14	39	8,042	17,272	215%	\$35,980
BMBMA	MICROSOFT CORPORATION	10/18/14	40	15,533	24,492	157%	\$39,452
8/18/14	MICROSOFT CORPORATION	1/17/15	20	996	6,500	853%	\$19,180
8/19/14	MICROSOFT CORPORATION	1/17/15	23	428	2,790	852%	\$10.948
8/19/14	MICROSOFT CORPORATION	1/17/15	25	1,801	11,830	657%	\$23,380
8/19/14	MICROSOFT CORPORATION	1/17/15	28	3,790	24,710	652%	\$52.444
3/19/14	MICROSOFT CORPORATION	1/17/15	30	8,449	59,724	707%	\$81.61E \$45.724
8/19/14	MICROSOFT CORPORATION	1/17/15	35	18,728	65,621	265%	\$352,744
5/19/14 8/19/14	MICROSOFT CORPORATION	1/17/18	20	13,372	323,567 1,950	548%	\$4,312
8/19/14	MICROSOFT CORPORATION MICROSOFT CORPORATION	1/15/16	23	120	785	654%	\$2,856
8/19/14	MICROSOFT CORPORATION	1/15/18	25	1,494	9,758	653%	\$28,644
8/19/14	MICROSOFT CORPORATION	1/15/16	28	1.368	6,514	476%	\$7,052
8/19/14	TEVA PHARM, IND. INC.	9/20/14	45	2 637	8,589	326%	\$1,150
8/19/14	TEVA PHARM, IND. INC.	9/20/14	47	16,539	45,055	272%	\$484,681
9/19/14	TEVA PHARM, IND, INC.	1/17/15	30	310	1,301	420%	\$3,296
B/19/14	TEVA PHARM, IND. INC.	1/17/15	35	2,966	9,640	325%	855,988
9/19/14	TEVA PHARM, INC. INC.	1/17/15	37,5	1,561	4,035	258%	84,518
8/19/14	WALGREEN CO	6/22/14	60	821	1,252	152%	818,023
8/19/14	Wyndham Worldwide Corp	8/20/14	70	350	560	(80%	812,250
8/20/14	CUMMINS INC.	9/20/14	130	130	385 850	295% 1058%	\$2,574
8/20/14	CUMMINS INC.	10/18/14	130	52 289	883	306%	\$4,056 \$5,130
B/20/14	3M	1/17/15	90	173	1,185	873%	\$13,424
8/20/14	3M	1/17/15	110	124	595	444%	\$8,807
8/20/14	PITNEY-BOWES INC	1/17/16	15	456	1,980	434%	53,844
8/20/14	Transposen Ltd	8/22/14	38.5	324	668	268%	\$2,925
8/20/14	Transocuur Lid	9/20/14	37	223	856	389%	\$3.675
8/20/14	Transocean Ltd	1/17/16	30	713	785	395%	\$200,250
8/20/14	Transoceen Ltd	1/17/16	33	178	920	517%	\$76,050
8/20/14	Transocean Ltd	1/16/16	25	46	599	1302%	\$68,625
8/20/14	Transocean Ltd	1/15/16	30	392	1,813	463%	\$730,125
8/21/14	LyondellBasell Industries NV	9/20/14	100	6.407	17,381	271%	\$1,890
6/21/14	Lyondell Basell Industries NV	9/20/14	105	4,433	11,955	270% 370%	\$18,410 \$9,500
8/21/14	LyondeliBasell Industries NV LyondeliBasell Industries NV	1/17/15	82.5	159	611	364%	\$3,640
8/21/14	Lyondell Basell Industries NV	1/17/15	85	603	1,986	325%	891,880
8/21/14	Lyondell Basell Industries NV	1/17/16	67.5	672	2,220	330%	822,060
8/21/14	SNAP-ON INCORPORATED	9/20/4 A	105	E12	1,250	244%	\$22,000
8/22/14	JOHNSON & JOHNSON	8/22/14	102	716	1,883	235%	\$7,770
8/22/14	JOHNSON & JOHNSON	6/22/14	103	973	2,177	224%	\$5,250
8/22/14	JOHNSON & JOHNSON	9/29/14	103	1,022	2,245	220%	\$1,960
8/22/14	NOBNHOL & NOSNHOL	9/20/14	97.5	339	801	235%	\$4,760
8/22/14	JOHNSON & JOHNSON	9/20/14	100	1,439	4,003	278%	\$40,530
8/22/14	NOSHHOL & NOSHHOL	10/18/14	101	178 £17	1.870	153%	\$3,220
8/22/14	NOZNHOL & NOZNHOL NOZNHOL & NOZNHOL	0/17/15	70	72	480	638%	\$3,000
8/22/14	JOHNSON & JOHNSON	1/17/15	75	1,242	5,335	430%	582,320
B/22/14	JOHNSON & JOHNSON	1/17/15	80	EOZ	2,604	433%	\$16,460
8/22/14	JOHNSON & JOHNSON	1/17/15	82.6	281	1,245	443%	\$3,080
8/22/14	JOHNSON & JOHNSON	1/17/15	85	331	1,438	434%	\$7,070
8/22/14	JOHNSON & JOHNSON	1/17/15	87.5	5,879	16,534	281%	\$6,790
8/22/14	JOHNSON & JOHNSON	1/17/15	90	8,384	23,518	281%	\$10,220
8/22/14	JOHNSON & JOHNSON	1/15/18	70	83	595	540%	\$5,320
8/22/14	MOSUNG & NOSUHOL	1/15/18	75	402	9,300	2313%	\$6,020
8/22/14	NOSMHOL & NOSMHOL	1/15/18	77.5	568	0,100	1802%	\$8,580
3/26/14	Green Plains Renewable Energy Inc.	9/20/14	57,5	3,037	2,200	90% 274%	\$4,456
8/27/14	CSX CORPORATION	9/20/14	22.5	1,360	3,740	275%	\$5,808
6/27/14	CenturyL/tk-ing	10/19/14	38	5,218	6,576	164%	85,618
8/27/14	ConturyLink Inc	#/17/15	30	218	1,435	558%	\$3,780
B/27/14	GenturyLink Inc	1/17/15	33	373	2,410	648%	\$3,240
8/27/14	CanturyLink Inc	1/15/18	26	65	515	700%	\$2,268
8/27/14	CenturyLink Inc	1/15/18	30	378	2,709	712%	\$3,240
8/27/14	DOMINION RESOURCES	9/20/14	67.5	#68	1,210	259%	13 ,960
B/27/14	CORNING INCORPORATED	1/17/15	. 8	420	1,155	275%	\$3,620
8/27/14	CORNING INCORPORATED	1/17/15	in	1,340	4,081	WE0E	\$10,270
6/27/14	CORNING INCORPORATED	1/17/15	12	9,839 240	10.944	301%	828,410
B/27/14	Lorillard Inc.	9/20/14	50.5	1,467	923 6.875	271% 469%	\$8,100 \$7,257
8/27/14	Lonlard Inc.	9/20/14	55	3,706	12,950	349%	12,091
8/27/14	Lorifard Inc.	9/20/14	57.5	1,985	4,816	348%	\$5,351
8/27/14	Laritard Inc.	1/17/15	40	100		650%	52,708
8/27/14	Lordard Inc	1/17/15	45	120		554%	52,768
8/27/14	Lorillant Inc.	1/17/15	50	1,213	5,600	482%	\$5,105
8/27/14	Loribard Inc.	1/15/18	959	198	738	377%	\$5.109
8/27/14	LEXMARICINTERNATIONAL	10/18/14	91	323	720	223%	\$10,800

Es Dividend Date	Company	Expiration Date	Stika	Open Interest Before Manipulation	One Day's Ballooned Volume	increase in Open Interest Following Manipulative Trading	Dividend Fayments to Open Interest
8/27/14	LEXMARK INTERNATIONAL	1/17/15	25	97	A50	464%	\$3,492
8/27/14	Magna International Inc.	9/20/14	100	265	650	245%	\$2,964
8/27/14	TESORO CORF TIME WARNER INC	9/20/14	57.5 55	293 2,260	5,005	257% 220%	\$6,630 \$1,016
8/27/14	UNION PACIFIC	9/20/14	100	667	1,014	235%	\$3,300
8727/14	UNION PACIFIC	1/17/15	50	256	1,795	701%	\$12,600
8/27/14	UNION PACIFIC	1/17/16	80	452 108	1,215	269% 307%	\$6,000 \$7,600
8/27/14	WHIRLPOOL CORPORATION WEYERHAEUSER CO	9/20/14	120	489	1,375	281%	\$4,437
9/27/14	WEYERHAEUSER CO	9/20/14	33	1,062	2.342	221%	\$3,844
8/27/14	WEYERHAEUSER CO	70/18/14	28	293	825	282%	81,943
8/27/14	WEYERHAEUSER CO	10/18/14	29	227	605	267%	\$1,885
8/27/14 8/27/14	WEYERHAEUSER CO WEYERHAEUSER CO	10/18/14	31,	918	2,278	248%	\$3,161 \$5,829
8/27/14	WEYERHAEUSER CO	1/17/15	25	234	880	376%	83,015
8/27/14	WEYERHAEUSER CO	1/15/16	23	442	1,650	373%	\$12,818
8/28/14	Agnico Eagle Mines Limited	1/17/15	17.5	1,523	1,950	129%	\$11,200
8/28/14 9/28/14	BLACKROCKING	1/15/16 8/29/14	200	35 239	225 480	643% 201%	\$7,720 \$6,720
8/28/14	HollyFrontier Corporation HollyFrontier Corporation	8/29/14	47.5	196	320	163%	\$3,232
8/28/14	HollyFrontier Corporation	9/05/14	46.5	155	320	205%	\$4,600
8/28/14	HollyFrontier Corporation	9/20/14	43.5	742	1,330	179%	\$3,104
B/28/14	HellyFrontier Corporation	9/20/14	44,5	5,671	18,488	326%	481,792
8/28/14	HellyFrontier Corporation HellyFrontier Corporation	9/20/14	45.5 46.5	1,854	4,202 2,918	225% 203%	\$6,384 \$1,152
8/28/14	HARTFORD FINANCIAL SERVICES	3/20/14	34	6,171	8,808	143%	\$1,000
8/28/14	HARTFORD FINANCIAL SERVICES	1/17/15	20	294	1,155	393%	\$3,762
8/28/14	HARTFORD FINANCIAL SERVICES	1/17/15	22	958	3,520	367%	\$8,570
5/25/14 3/25/14	HARTFORD FINANCIAL SERVICES KEYCORP NEW	1/15/16	20	1,346	3,740 3,195	278%	\$23,632 \$5,870
B/28/14	LOCKHEED MARTIN	9/20/14	155	141	281	199%	\$4,256
8/28/14	LOCKHEED MARTIN	9/20/14	160	571	1,052	184%	\$21,147
8/28/14	LOCKHEED MARTIN	3/20/14	165	1,234	3,416	277%	\$35,112
8/28/14	LOCKHEED MARTIN	9/20/14	170	2,426	5,588	230%	\$38,570
6/28/14	LOCKHEED MARTIN	1/17/15	110	57 477	280	203%	\$5,852 &8,113
5/28/14	MCDONALDS CORP	8/29/14	92	540	1,550	287%	\$22,880
8/28/14	MCDONALDS CORP	9/20/14	80	302	911	302%	\$12,655
0/28/14	MCDONALDS CORP	1/17/15	75	54	385	458%	\$5,589
B/28/14	MCDONALDS CORP	1/17/15	80	d08 502	1,538	377% 287%	\$16,038 \$21,708
8/28/14	NIKE INC, CLASS B	10/18/14	65	1.645	3,000	182%	\$38,928
8/28/14	NRG Yield Inc.	9/20/14	48	547	990	181%	\$1,570
8/28/14	TESSERA TECHNOLOGIES INC.	9/20/14	23.48	718	7,620	226%	\$3,680
8/28/14 8/29/14	TESSERA TECHNOLOGIES INC. Qualcomm Inc.	9/20/14 8/29/14	24.48	3,081 544	5,490 1,065	179%	\$30,170 \$1,216
8/29/14	Quelcomm Inc.	9/20/14	70	1,144	4.019	351%	\$25,242
8/29/14	Qualcomm Inc.	9/20/14	72,5	1,263	3,502	277%	\$14,448
8/29/14	Clustcomm Inc.	10/18/14	55	476	1,572	330%	518,422
8/29/14 8/29/14	Qualcomm Inc.	10/18/14	70 35) 11B	2,939 S58	263% 889%	\$27,972 \$3,234
8/29/14	Qualcomm inc.	1/17/15	40	501	3,250	649%	\$3,358
8/28/14	Qualcomin Inc.	1/17/15	45	502	3,305	658%	\$2,814
8/28/14	Qualcomin Nic	1/17/15	50	514	3,385	659%	\$17,640
8/29/1A 8/29/14	Qualcomm Inc. Qualcomm Inc.	1/17/15	55 57.5	595 253	3,904 1,682	656% 640%	\$5,670 \$1,470
8/29/14	Qualcomin Inc.	1/17/15	50	6,258	29,432	470%	\$186,396
8/29/14	SCHLUMBERGER LTD	9/20/14	100	163	508	278%	\$5,240
8/29/14	SCHLUMBERGER LTD	1/15/16	50.	565	1,520	269%	\$23,000
9/02/14	China Mobile Limited China Mobile Limited	9/20/14	42.5	50 3,250	21,180	667% 652%	\$2,683 \$27,619
9/02/14	China Mobile Limited	9/20/14	50	3,043	27,602	700%	\$33,780
9/02/14	China Mobile Limited	9/20/14	52.5	2,044	11,032	540%	\$45,106
9/02/14	China Mobile Limited	9/20/14	55	909	4,750	523%	\$32,686
9/02/14	China Mobile Limited	9/20/14	57.8	1,603	11,223	700%	860,506
9/02/14	China Mobile Limited Chine Mobile Limited	12/20/14	50 52.5	843 1 127	5,470 7,913	649% /02%	\$41,430 \$47,689
9/02/14	China Mobile Limited	1/17/15	40	294	3,845	1308%	810,432
9/02/14	China Mobils Limited	1/17/15	42.5	67	1,110	1276%	\$5,266
9/02/14	China Mobile Limited	1/17/15	45	1,695	23,655	1395%	\$5,663
9/02/14	China Mobile Limited China Mobile Limited	1/17/15	47.5 50	2,925 5.049	41,037 70,676	1403%	\$13,711
9/02/14	China Mobile Limited	1/17/15	52.5	3,445	19,655	571%	\$72,130
9/02/14	China Mobile Limited	1/15/10	35	64	840	1313%	84,173
9/02/14	China Mobile Limited	1/15/16	37.5	982	9,516	1394%	\$63,785 \$43,590
9/02/14	China Mobile Limited China Mobile Limited	1/15/16	40 42.5	627 117	8,750 1,580	1396% 1350%	\$12,720 \$3,974
9/02/14	China Mobile Limited	1/15/16	45	639	4,500	704%	\$31,097
9/02/14	HOME DEPOT INC	9/05/14	52	2,295	6,773	295%	\$18,894
9/02/14	HOME DEPOT INC	9/05/14	92	621	718	116%	\$18,215
9/02/14	HOME DEPOT INC	9/20/14	60 62.5	3,595 3,687	5,171 10,339	227W 282W	\$78,302 \$40,373
9/02/14	HOME DEPOT INC	9/20/14	84	588	845	144%	\$6,298
9/02/14	HOME DEPOT INC	9/20/14	85	6,015	11,438	190%	\$12,784
9/02/14	HOME DEPOT INC	9/20/14	86	388	1,040	270%	\$1,318
9/02/14	HOME DEPOT INC.	9/20/14	87.5	4,083	13,635	291% 284%	\$20,774 \$8,601
9/02/14							

Ex Dividend Date	Company.	Expiretau Date	Sitke	Open Interest Before Manipulation	One Day's Ballooned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interes:
9/02/14	HOME DEPOT INC	10/18/14	82.5	1,104	2,679	260%	\$2,209
9/02/14	HOME DEPOT INC	11/22/14	60	366	977	267%	\$16,967
9/02/14	HOME DEPOT INC	11/22/14	70 72.6	482 178	1,266	263% 268%	\$17,890 \$1,269
9/82/14	HOME DEPOT INC	11/22/14	75	944	2,465	261%	\$2,068
9/02/14	HOME DEPOT INC	19/22/14	77.5	624	1,728	277%	\$2,021
9/02/14	HOME DEPOT INC	1/17/15	.50	82	515	628%	\$2,820
9/02/14	HOME DEPOT INC	1/17/15	70	2,512	11,830	471%	\$6,204
9/02/14	HOME DEPOT INC	1/17/15	72.5	831 1,635	2,520 5,356	303% 328%	80,131
9/02/14	The Moseic Company (HOLDING COMPANY)	9/20/14	42.5	315	5,330	279%	84.500
9/02/14	The Moselc Company (HOLDING COMPANY)	9/20/14	45	1,075	2,976	277%	81,525
9/02/14	The Mosaic Company (HOLDING COMPANY)	1/17/15	30	333	1,211	364%	\$6,625
9/02/14	The Mosaic Company (HOLDING COMPANY)	1/15/16	30	392	1,200	206%	\$2,075
9/02/14	SUNCOR ENERGY SUNCOR ENERGY	9/20/14	36	584 863	1,595	273% 275%	\$674 \$4,615
9/02/14	SUNCOR ENERGY	9/20/14	38	1,973	2,348	118%	833,603
8/02/14	SUNCOR ENERGY	1/17/15	25	235	1,045	445%	\$5,860
9/02/14	SUNCOR ENERGY	1/17/15	30	485	1,850	340%	\$5,834
9/02/14	SUNCOR ENERGY	1/17/15	32	2,734	6,540	230%	80,153
9/02/14	Shares 20+ Year Treasury Bond ETF Shares 20+ Year Treasury Bond ETF	9/05/14	103	615 178	905	147%	6784
9/02/14	IShares 20+ Year Treasury Bond ETF	9/20/14	110	2,232	8,018	264%	\$4,172 \$1,824
9/02/14	IShares 20+ Year Treasury Bond ETF	9/20/14	111	1,193	3,669	308%	\$1,848
9/02/14	ISharez 20+ Year Treasury Bond ETF	9/20/14	112	2,792	3,915	140%	824,248
8/02/14	Sharea 20+ Year Treasury Borus ETF	9/20/14	113	4,179	5,963	143%	\$10,836
9/03/14	BANK OF AMERICA CORP. BANK OF AMERICA CORP.	9/05/14	14.5	2,340	3,322	142%	\$4,815
9/03/14	BANK OF AMERICA CORP.	9/05/14	15,5	2,426 4,531	4,418 6,494	162%	\$7,050 \$14,170
9/03/14	BANK OF AMERICA CORP.	9/20/4#	12	3,103	7,453	240%	\$1,820
9/03/14	BANK OF AMERICA CORP.	9/20/14	12	6,472	15,600	241%	\$9,465
9/03/14	BANK OF AMERICA CORP.	9/20/14	14	17,706	42,763	242%	\$49,409
9/03/14	BANK OF AMERICA CORP.	10/18/14	43	3,531	7,064	200%	\$4,415
9/03/14	BANK OF AMERICA CORP. BANK OF AMERICA CORP.	1/17/15	3	788 1,939	2,350 6,285	298% 324%	\$575 \$4,310
9/03/14	BANK OF AMERICA CORP.	1/17/16	- 6	15,419	46,228	300%	\$15,170
9/03/14	BANK OF AMERICA CORP.	1/17/15	7	32,819	98,415	300%	\$39,480
9/03/14	BANK OF AMERICA CORP.	1/15/18	5	3,349	10,075	₩10E	\$8,825
9/03/14	BAXTER INTERNATIONAL INC.	1/17/15	50	203	770	379%	\$B,632
9/03/14	BAXTER INTERNATIONAL INC. BAXTER INTERNATIONAL INC.	1/17/18	57.5 55	112	385 495	344%	\$5,408 \$5,408
9/03/14	BAXTER INTERNATIONAL INC.	1/17/15	65	804	2,203	274%	32,444
9/03/14	BHP BILLITON LMTD ADS	1/17/16	50	60	560	1100%	\$6,820
9/03/14	SHP BILLITON LMTD ADS	1/17/15	55	65	715	1100%	\$3,348
9/03/14	C H ROBINSON WORLDWIDE INC	1/15/16	35	137	495	361%	84,235
9/03/14	JOHNSON CONTROLS KIMBERLY-CLARK	1/17/15	48 70	1,270	2,025	159% 733%	\$2,112 \$5,040
9/03/14	KIMBERLY-CLARK	1/17/15	87.5	210	1,155	350%	516,800
9/03/14	PDL BioPharma	9/20/14	9	367	727	*BEI	\$1,920
9/03/14	PUBLIC SERVICE ENT GROUP INC	9/20/14	35	1,208	1,473	122%	\$8,547
9/03/14	PEPSICO	9/20/14	90	3,119	10,980	352%	\$8,122
9/03/14	PEPSICO PEPSICO	9/20/14	91	240 107	262	118% 481%	\$1,900 \$5,961
9/03/14	PEPSICO	1/17/15	70	307	1,397	455%	\$18,930
9/03/14	PEPSICO	1/17/15	75	117	B67	570%	\$1,703
9/03/14	PEPSICO	1/17/15	77.5	969	4,550	470%	\$6,550
9/03/14 9/03/14	PEPSICO	1/17/15	80	3,643	12,048	355%	118,406
9/03/14	ROSS STORES INC	9/20/14	67.5	72 2,462	465	646% 163%	\$3,885 \$540
9/03/14	SEALED AIR CORP	1/17/15	20	4.217	4,220	TÓDW	\$676
9/03/14	WASTE MANAGEMENT INC	9/20/14	46	780	1,869	240%	\$2,888
9/03/14	WASTE MANAGEMENT INC	10/18/14	42	749	550	221%	\$1,013
9/03/14	WASTE MANAGEMENT INC WASTE MANAGEMENT INC	10/18/14	43	3,272	7,965	243%	\$1,200
9/03/14	WASTE MANAGEMENT INC	1/17/15	40	1,655	5,205 5,980	194%	\$1,200 \$4,650
9/03/14	WASTE MANAGEMENT INC	1/17/15	42	1,206	2,680	222%	\$1,125
9/04/14	American Really Capital Properties Inc.	1/17/15	10	702	2,542	362%	\$470,839
9/04/14	American Realty Capital Properties Inc.	1/17/15	11	1,118	1,980	175%	\$143,461
9/04/14	American Realty Capital Properties Inc.	1/15/16	10	2,090	5,300	301%	\$38,273
9/04/14	BreitBurn Energy Partners L.P. BreitBurn Energy Partners L.P.	1/17/15	17.5	1,024	3,472 850	339%	\$15,142 \$56,732
9/04/14	Ensen PLG	9/20/14	48	235	785	334%	\$3,300
9/04/14	Ensco PLC	9/20/14	47	770	1,302	159%	\$9,750
3/04/14	Ensco PLC	1/17/15	40	194	840	433%	193,075
9/04/14	KANSAS CITY SOUTHERN	9/20/14	80	736	1,470	208%	320,440
9/04/14	KANSAS CITY SOUTHERN KANSAS CITY SOUTHERN	9/20/14	100	822 609	1,650 1,200	201% 197%	\$1,428 \$1,792
9/04/14	Lini Energy LLC-Units	9/20/14	29	195	260	133%	\$3,334
9/04/14	Linn Energy LLC-Units	10/18/14	28	996	4 180	420%	\$23,286
9/04/14	Linn Energy LLC-Units	10/16/14	29	224	405	181%	\$16,365
9/04/14	Linn Energy LLC-Units	1/17/15	20	177	793	448%	\$111,450
9/04/14	Linn Energy LLC-Units	1/17/15	25 28	966 1,695	4 DUS 5 228	415% 275%	\$49,770 \$53,514
9/04/14	Linn Energy LLC-Units	1/15/15	23	554	2,410	435%	\$31,239
9/04/14	Linn Energy LLC-Units	1/15/15	25	382	1,625	425%	\$27,953
9/04/14	Linn Co LLC	9/20/14	27	290	770	266%	\$6,661
9/04/14	Linn Co. LLC	9/20/14	28	206	550	267%	\$4,832
8/04/14	Linn Co LLC	9/20/14	28	181	240	183%	\$1,208

Es Dividend Date	company	Expiration Date	Sine	Open Interest Before Manipulation	One Day's Balloomed Volume	Increase in Open Interest Following Manipulsave Trading	Dividend Payments to Open Interest
3/84/14	Linn Co. LLC	3/20/14	30	671	(,90)	283%	\$701
9/04/14	Linn Co. LLC	11/22/14	26	220	605	275%	\$29,741
9/04/14	Linn Co. LLC Linn Co. LLC	11/22/14	27 28	6,020 5,279	28,000	465%	\$65,353 \$135,195
9/04/14	Linn Co. LLC	1/17/15	27	398	1,735	436%	\$8,504
9/04/14	Linn Co. LLC	1/15/16	23	285	1,245	497%	524,474
9/04/14	Linn Co. LLC	1/16/16	25	1,661	7,700	464%	584,077
9/04/14	North Atlantic Drilling Ltd	9/20/14	10.	446	1,227	275%	\$5,496
9/04/14	PRINCIPAL FINANCIAL GROUP INC. Seadrill Lid.	9/20/14	50 36	742 728	1,250	168%	\$14,314 \$35,700
9/04/14	Seadrii Lid	10/18/14	33	456	3,005	659%	533,200
9/04/14	Seadnii Liu.	10/18/14	34	65	520	600%	35,600
0/04/14	Seadrill Ltd.	10/18/14	35	745	3,274	439%	523,400
9/04/14	Seadrill Ltd.	1/17/15	30	156	1,033	6621%	\$10,800
9/04/14	Seadril Lid.	1/17/15	33	425	2,510	861%	\$21,000
9/04/14 9/04/14	Seadrill Lid.	1/17/15	34	235	13,920	255% 666%	\$12,500 \$130,900
B/Q5/14	CANADIAN NATIONAL PAILWAY	10/18/14	80	410	766	187%	\$2,560
9/05/14	COACH INC.	9/20/14	84	303	541	179%	51,283
9/05/14	COACH INC.	9/20/14	35	781	1,425	203%	\$1,789
9/05/14	COACH INC.	1/15/16	23	268	902	337%	\$8,978
9/08/14	ANADARKO PETROLEUM CORPORATION	9/20/14	05	12,5/7	12,500	99%	\$338,445
9/08/14 9/08/14	CME Group Inc.	9/20/14	72.5	1,239	1,219	274% 289%	\$8,366
8/00/14	CME Group Inc	B/20/14	73	213	670	315%	\$1,316
5/00/14	CME Group Inc	1/17/15	50	122	550	451%	\$4,606
9/08/14	DingEquity Inc.	9/20/1A	80	1,122	2,800	250%	\$84,000
9/08/14	Gotar LING flid	9/20/14	40	5,169	11,330	219%	\$2,925
9/08/14	General Motors Co.	5/12/14	34	196	254	130%	\$2,970
9/08/14	General Motors Co. General Motors Co.	9/20/14	28	128 4,289	20,010	215% 467%	\$1,320 \$19,080
9/08/14	General Motors Co.	9/20/14	21	538	2,330	435%	\$3,510
9/08/14	General Motors Co.	9/20/14	32	1,979	9,245	467%	\$15,210
9/08/14	General Motors Co.	9/20/14	33	7,368	20,752	282%	\$19,530
9/08/14	General Motors Co.	1/17/15	20	2,938	20,805	700%	\$77,520
9/06/14	General Motors Co.	1/17/15	25	722	5,045	699%	\$24,050
9/08/14	General Motors Co.	1/17/15	27	1,589	7,411	466% 698%	\$33,540 \$24,030
9/08/14	General Motors Co. General Motors Co.	1/15/16	22	414	2,735	561%	\$19,440
9/08/14	HEWLETT PACKARD	9/20/14	31	245	300	122%	\$960
9/08/14	HEWLETT PACKARD	B/20/14	34	1,612	3,570	222%	32,112
9/08/19	HEWLETT PACKARD	9/20/14	35	5,453	12,368	227%	88,512
9/08/14	HEWLETT PACKARD	9/20/14	35.5	1,383	3,050	22196	\$2,032
9/08/14	HEWLETT PACKARD	1/17/15	10	497 459	1,600	327% 327%	\$3,456 \$3,984
9/08/14	HEWLETT PACKARD HEWLETT PACKARD	1/17/15	15	504	1,680	333%	\$4,704
9/08/14	HEWLETT PACKARD	1/17/15	20	1,281	3,900	325%	\$7,656
9/08/14	HEWLETT PACKARD	1/17/15	22	1,668	4,620	277%	\$7,792
9/08/14	HEWLETT FACKARD	1/17/15	25	5,644	15,510	275%	\$5,184
9/08/14	HEWLETT PACKARD	7/19/16	16	355	990	278%	\$5,360
9/08/14	OCCIDENTAL PETROLEUM	1/15/16	20 97.5	998 354	2,750	276% 280%	\$5,552 \$2,448
9/08/14	OCCIDENTAL PETROLEUM	1/17/15	40	43	380	584%	\$3,095
9/05/14	DCCIDENTAL PETROLEUM	1/17/15	.50	47	460	979%	\$3,384
9/08/14	OCCIDENTAL PETROLEUM	1/17/15	82.5	183	598	326%	\$120,384
9/08/14	PPL CORPORATION	10/18/14	32	242	502	248%	\$3,725
9/08/14	REYNOLDS AMERICAN INC. REYNOLDS AMERICAN INC.	1/17/15	93 50	50	3,300	770% 263%	\$3,050
3/08/14	The Travelers Companies Inc.	9/20/14	90	105	785	271%	\$1,405
9/08/14	WellPoint Inc.	9/20/14	160	457	1,074	235%	\$3,019
9/08/14	WellPoint Inc.	9/20/14	110	1,465	3,320	223%	\$9,319
9/09/14	AMERICAN INTERNATIONAL GROUP	1/17/15	20	779	1,950	250%	\$8,313
9/09/14	AMERICAN INTERNATIONAL GROUP	1/17/15	25	1,632	4,600	251%	\$6,013
9/09/14	AMERICAN INTERNATIONAL GROUP BEST BUY CO. INC.	9/20/14	20	1, 163 3,625	2,900 11,520	249W 301%	\$12,750 \$1,330
9/09/14	BEST BUY CO. INC.	9/20/14	27	13,027	34,602	287%	\$2,109
9/09/14	BEST BUY CO. INC.	9/20/14	29	6,480	15,620	241%	\$950
9/09/14	LUMOS NETWORKS CORPORATION	10/18/14	10	790	1,800	229%	\$7,580
9/09/14	LUMOS NETWORKS CORPORATION	1/17/15	10	1,836	4,292	234 Vr	\$6,700
9/10/14	CANADIAN NATURAL RESOURCES LIMITED	9/20/14	36	829	2,520	304%	\$3,277
9/10/14	CANADIAN NATURAL RESOURCES LIMITED DEVON ENERGY CORP.	1/17/15	38 40	7,398	13,200	175% 303%	\$30,027 \$30,360
9/10/14	DEVON ENERGY CORP.	1/17/15	45	2,004	6,000	299%	\$48,768
9/10/14	Frontier Communications Corp.	9/20/14	6	994	3,584	381%	\$390
9/10/14	Frontier Communications Corp.	1/17/18	45	908	2,254	248%	\$1,690
9/10/14	Frontier Communications Corp.	1/17/16	â	13,679	23.510	172%	\$15,620
9/10/14	GNC Holdings Inc	8/20/14	35	B.434	10.800	168%	\$720
9/10/14	Nested OMX Group National Cilwall Varon Inc.	1/17/16	40 50	778 147	700	176% 476%	\$815 \$2,024
9/10/14	National Cilwell Varco Inc.	1/17/15	50	213	650	305%	30,014
9/10/14	National Oliwell Varon Inc.	1/15/16	50	138	700	507%	\$4,508
9/10/14	SHIP FINANCE INTERNATIONAL LIMITED	51/22/14	15	101	140	139%	51,230
9/10/14	UNITEDHEALTH GROUP INC.	0/20/14	77.5	1.919	4,922	256%	\$23,063
	UNITEDHEALTH GROUP INC.	9/20/14	80	3,352	5,893	176%	\$1,088
5/10/14		promote a	March 201	10 mm	4 5 5	at William and	44.45
9/10/14	UNITEDHEALTH GROUP INC.	9/20/14	82.5	3,047 5,774	4,627	158% 121%	\$1,313
		9/20/14 9/20/14 1/1//15	82.5 66 36	3,047 5,774 172	4,627 6,972 666	156% 121% 389%	\$1,313 \$3,663 \$5,550

Eli Dividend Date	Company	Espiration Liam	Sirike	Open Interest	One Day's Ballooned Volume	Increase in Doen Interest Following Mampulative Trading	Dividend Payments to Open Interest
9/10/14	WILLIAMS COMPANIES	11/22/14	50	5,022	17,538	349%	\$80,472
9/10/14	WILLIAMS COMPANIES	1/17/15	20	200	1,300	650%	\$11,200
9/10/14	WILLIAMS COMPANIES	1/17/15	30	1,599	11,200	700%	\$80,920
9/10/14	WILLIAMS COMPANIES	1/17/15	33	637	4,490	705%	\$32,872
9/10/14	WILLIAMS COMPANIES	1/17/15	85	410	7,655	64B%	\$2,688
9/10/14	WILLIAMS COMPANIES	1/17/15	40 62	27,921 7,886	260,415 56,000	933% 710%	315,456 54,872
9/10/14	WILLIAMS COMPANIES WILLIAMS COMPANIES	1/1//15	43	539	3,520	653%	\$5,656
9/10/14	WILLIAMS COMPANIES	1/17/15	44	307	2,005	b53%	\$2,744
9/10/14	WILLIAMS COMPANIES	1/17/15	45	53,714	250,736	467%	\$176,008
9/10/14	WILLIAMS COMPANIES	1/17/15	46	1,376	3,210	233%	\$5,320
9/10/14	WILLIAMS COMPANIES	1/17/15	47	5,948	28,002	471%	\$35,336
9/10/14	WILLIAMS COMPANIES	1/15/16	25	68	595	902%	\$3,696
9/10/14	WILLIAMS COMPANIES	1/15/16	28	72	650	903%	\$2,912
9/10/14	WILLIAMS COMPANIES	1/10/16	30	2,700	18,900	700%	\$150,410
9/1D/1A	WILLIAMS COMPANIES	1/13/18	33	898	5,300	702%	152,136
9/10/14	WILLIAMS COMPANIES	1/15/16	35	658	3,790	576%	\$19,096
9/10/14	WILLIAMS COMPANIES	1/15/16	37	348	2,275	654%	\$5,992
8/10/14	WILLIAMS COMPANIES WILLIAMS COMPANIES	1/15/16	40	27B 10,274	1,816 48,355	658% 471%	\$9,856 \$2,016
9/11/14	Digital Really Trust Inc	1/17/15	50	72	785	1000%	¥3,154
9/11/14	Digital Realty Trust Inc.	1/18/16	40	51	595	1167%	\$2,158
9/11/14	DOMINO'S PIZZA INC	9/20/14	70	293	576	197%	5750
9/11/14	EASTMAN CHEMICAL CO	9/20/14	BO	469	1,182	248%	\$1,690
8/11/14	FAMILY DOLLAR STORES	9/20/14	75	1,208	3,660	303%	\$9,052
8/11/14	FAMILY DOLLAR STORES	10/18/14	55	182	385	212%	\$2,170
9/11/14	FAMILY DOLLAR STORES	10/10/14	67.5	643	1,430	222%	\$837
9/11/14	FAMILY DOLLAR STORES	10/18/14	70	703	1,433	204%	\$3,286
9/11/14	FAMILY DOLLAR STORES	1/17/15	50	369	1,320	358%	\$1,550
9/11/14	FAMILY DOLLAR STORES	1/17/15	52.5	943	3,720	394%	\$23,901
9/11/14	FAMILY DOLLAR STORES	1/17/15	65	7,028 926	21,000	289%	\$43,558
9/11/14	COCA-COLA COMPANY COCA-COLA COMPANY	9/12/14 9/20/14	41.5	2,930	1,514	163% 388%	\$1,068 \$12,932
8/11/14	COCA-COLA COMPANY	9/20/14	40	5,123	18,098	353%	84.148
9/11/14	COCA-COLA COMPANY	D/20/14	40.5	268	718	269%	\$1,525
8/11/14	COCA-COLA COMPANY	9/20/14	41	3,634	9,733	254%	84.728
8/11/14	COCA-COLA COMPANY	9/20/14	41.5	8,003	14,856	186%	15.673
9/11/14	COCA-COLA COMPANY	10/18/14	39	1,464	5,999	410%	\$1,883
9/11/14	COCA-COLA COMPANY	10/19/14	40	4,232	12,558	297%	323 119
9/11/14	COCA-COLA COMPANY	11/22/14	37	419	1,155	276%	\$2,349
9/11/14	GOCA-COLA COMPANY	11/22/14	38	1,018	2,009	197%	33,081
9/11/14	COCA-COLA COMPANY	1/17/15	30	1,175	5,256	703%	\$10,553
9/11/14	COCA-GOLA COMPANY	1/17/15	32.5	1,035	7,290	704% 464%	\$10,828
9/11/14	COCA-COLA COMPANY COCA-COLA COMPANY	1/17/15	35 37.5	16,912 16,028	78,480 45,317	283%	\$114,284 \$46,055
9/11/14	COGA-COLA COMPANY	1/15/16	30	1,682	11,755	699%	\$26,635
9/11/14	COGA-COLA COMPANY	1/15/16	33	5,996	21,010	350%	\$124,440
9/11/14	ALTRIA GROUP INC	9/12/14	43	952	2,375	249%	\$2,080
9/11/14	ALTRIA GROUP INC.	9/20/14	40	2,480	7,334	296%	\$2,756
3/11/1/4	ALTRIA GROUP INC.	0/20/14	42	7,191	25,492	354%	\$14,976
0/11/14	ALTRIA GROUP INC.	9/20/14	42.5	645	2,525	299%	\$1,352
9/11/14	ALTRIA GROUP INC.	1/17/15	25	167	1,030	E17%	\$8,424
9/11/14	ALTRIA GROUP INC.	1/17/15	28	128	840	556%	35,824
9/11/14	ALTRIA GROUP INC.	1/17/15	30	107	650	£07% 858%	33,536
9/11/14	ALTRIA GROUP INC. ALTRIA GROUP INC.	1/17/15 1/17/15	32	247 592	1,825 4,210	711%	\$12,168 \$9,100
9/11/14	ALTRIA GROUP INC.	1/47/45	37	931	6,590	708%	\$8,840
9/17/14	ALTRIA GROUP INC	1/17/16	.39	1,126	2,800	249%	\$7,696
9/11/04	ALTRIA GROUP INC.	1/17/15	40	16,741	36,253	193%	\$170,144
9/11/14	ALTRIA GROUP INC.	1/15/16	28	60	380	533%	\$3,120
3/11/14	ALTRIA GROUP INC.	1/15/18	30	230	1,515	€59%	57,746
9/11/14	ALTRIA GROUP INC.	1/15/16	-33	231	1,570	680%	\$7,696
9/11/14	ALTRIA GROUP INC.	1/15/16	35	535	4,495	705%	326,520
9/11/14	ALTRIA GROUP INC.	7/14/16	37	2,444	5,558	227%	\$71,916
9/11/14	MERCK & CO	9/20/14	57.5	4,808	8,573	178%	31,564
9/11/14	MERCK & CO	10/18/14	50 52.5	328 1,125	1,030	314% 349%	\$1,672 831,500
9/11/14	MERCK & CO MERCK & CO	10/13/14	55	6,290	22,019	350%	517,424
9/11/14	MERCK & CO	1/17/16	35	337	2,220	659%	\$14,828
9/11/14	MERCK & CO	1/17/15	40	323	7,085	546%	\$14,080
9/11/14	MERCK & CO.	1/17/15	42	521	3,645	700%	\$15,180
9/11/14	MERCK & CO	1/17/15	45	1,337	9,365	700%	\$52,228
9/11/14	MERCK 8 CO	1/17/18	47	439	1,954	445%	\$3,036
9/11/14	MERCK & CO	1/17/15	50	12,719	44,821	353%	\$150,008
9/11/14	MERCK & CO	7/15/16	40	586	4,075	695%	\$25,848
9/11/14	MERCK & CO	1/15/16	43	551	3,912	710%	\$4,708
9/11/14	UGL CORPORATION	1/17/15	26.67	90	240	267%	\$1,479
9/11/14	The Western Union Company The Wastern Union Company	1/17/15	10	1,762 786	7 865 2 845	435% 324%	\$2,963 \$6,088
9/11/14	The Western Union Company The Western Union Company	1/15/18	10	1,130	4 955	438%	\$8,088
9/12/14	American Railcar Industries Inc.	9/20/14	70	268	540	205%	\$3,520
9/12/14	HARLEY DAVIDSON INC.	9/20/14	62.5	1,441	2,622	175%	\$31,845
9/12/14	TIGC Capitel Corporation	11/22/14	7.5	120	140	11796	\$2,900
9/15/14	HUNTINGTON BANCSHARES	1/17/15	5	3,036	3,800	125%	\$13,740
0/15/14	Texas Roadhouse Inc.	9/20/14	25	565	744	138%	\$510
9/16/14	INTERNTAL GAME TECH	10/16/14	13	4,059	0,000	197%	\$42,999
9/16/14	INTERNTAL GAME TECH	13/18/14	74	2,366	5,900	249%	\$22,297
9/16/14	INTERNTAL GAME TECH	7/15/16	10.	754	3,811	505%	84,301

E* Dividend Date	Company	Expiration Date	Sitrika	Open Interest Before Manipulation	One Day's Ballooned Volume	Increase in Open Interest Following Mamputative Trading	Dividend Payments to Open Interest
9/16/14	SAFEVVAY INC.	1/17/18	17	257	935	364%	\$5.911
9/17/14	Apollo Investment Corporation	12/20/14		1,365	1,750	128%	\$27,100
9/17/14	Ayaga Technologies Limited	9/20/14	70	153	-140	289%	\$1.728
9/17/14	Avago Technologies Limited	9/20/14	75	1,252	3,438	275%	5096
9/17/14	Avaga Technologies Limited	9/20/14	80	761	2,096	275%	\$1,632
9/17/14	Avaga Technologies Limited	9/20/14	82.5 70	904 443	2,482	275%	\$5.440 \$1.962
9/17/14	Avago Technologies Limited CROWN CASTLE INTER.	10/18/14	75	247	502	244%	\$1.785
9/17/14	CROWN CASTLE INTER:	10/13/14	57.5	900	2,250	250%	526,250
9/17/14	DSW INC	9/20/14	25	158	202	129%	\$750
9/17/14	DSW INC	10/18/14	25	2,582	2,718	105%	\$3,669
9/18/14	BENERAL ELECTRIC	9/20/14	20	129	382	266%	\$660
9/18/14	GENERAL ELECTRIC	0/20/14	21	448	1,210	270%	\$1,090
9/18/14	GENERAL ELECTRIC	3/20/14	22	986	3,107	315%	35,522
9/18/14	GENERAL ELECTRIC	9/20/14	23	748	2,475	331%	\$4,842
9/18/14	GENERAL ELECTRIC	9/20/14	24	1,897	7,534	397%	\$5,818
9/18/14	GENERAL ELECTRIC	9/20/14	25	11,246	39,991	356% 267%	\$21,406 \$2,682
9/18/14	GENERAL ELECTRIC GENERAL ELECTRIC	9/20/14	25.5	1,37g 35,227	3,659 105,363	289%	\$129,920
9/16/14	GENERAL ELECTRIC	0/26/14	25.5	690	1,338	194%	\$948
9/18/14	GENERAL ELECTRIC	10/18/14	23	713	1,984	278%	\$3,344
9/19/14	GENERAL ELECTRIC	10/13/14	24	2,134	7,740	363%	\$3,344
9/18/14	GENERAL ELECTRIC	10/18/14	25	7,302	8,210	112%	547,284
9/16/14	GENERAL ELECTRIC	11/22/14	24	1,015	2,295	226%	\$3,520
9/18/14	GENERAL ELECTRIC	12/20/14	20	221	717	324%	\$2,574
9/18/14	GENERAL ELECTRIC	1/17/15	13	3,337	23,420	702%	\$73,392
9/18/14	GENERAL ELECTRIC	1/17/15	15	939	5,500	703%	\$17,996
9/18/14	GENERAL ELECTRIC	1/17/15	18	3,063	21,440	700%	\$32,582
9/18/14	GENERAL ELECTRIC	1/17/15	20	11,745	81,028	608%	\$177,804
9/18/14	GENERAL ELECTRIC GENERAL ELECTRIC	1/17/16	22	23,582	/10,685 6,300	469% 352%	\$286,598 \$39,402
9/18/14	GENERAL ELECTRIC	1/15/18	15	438.	2,870	855%	\$9,416
9/18/14	GENERAL ELECTRIC	1/15/18	411	2,816	19,745	701%	\$57,860
9/18/14	GENERAL ELECTRIC	1/15/16	20	34,854	122,618	352%	\$757,678
9/18/14	Hatteras Financial Corponition	1/15/16	17	138	400	290%	\$6,650
9/18/14	HUNTSMAN CORPORATION	1/17/15	10	281	770	274%	\$3,513
9/18/14	LAMAR ADVERTISING	4/17/15	45	194	650	335%	810,126
9/18/14	Las Vegae Sends Corp	9/20/14	55	452	1,235	273%	\$3,750
9/18/14	Las Vegas Sands Corp	9/20/14	60	620	1,891	305%	510,350
9/18/14	Lisa Vingasi Sands Corp	9/20/14	60.5	689	2,811	408%	\$7,500
9/18/14 D/18/14	Las Vegas Sands Corp	9/20/14	51 61.5	339 858	1,762	520% 125%	511,550
9/18/14	Las Vegas Sands Corp Las Vegas Sands Corp	9/20/14	62	618	1,270	207%	\$2,500 \$13,750
BABAA	Las Vegas Sands Corp	10/18/14	A7.5	100	125	125%	\$5,000
9/16/14	Las Vegas Sands Corp	1/17/15	44.25	184	715	389%	\$8,100
9/18/14	ROYAL CARIBBEAN CRUISES LTD.	9/20/14	80	678	1,972	277%	\$1,050
9/18/14	ROYAL CARIBBEAN CRUISES LTD.	1/17/15	30	144	850	382%	\$4,200
9/18/14	TIFFANY & CO.	9/20/14	97.5	2,532	5,579	220%	\$29,488
9/18/14	TOTAL B.A	1/17/15	56	139	550	398%	529,919
9/19/14	DIAGEO PLC	1/17/15	110	47	08)	383%	19,927
9/19/14	SPDR D.IA ETF Trust PowerShares QQQ Trust	9/20/14	98.63	26,464 40,416	28,058 59,377	106%	\$14,531 \$154,242
9/19/14	PowerShares QQQ Trust	1/17/15	34.53	203	DOL	146%	\$5,708
9/19/14	PowerShares QQQ Trust	1/17/15	59.63	805	981	1199	\$22,601
9/19/14	PowerShares QQQ Trust	1/17/15	59.63	4,010	4,000	100%	\$10,092
9/19/14	3PY Option	9/20/14	160	123	174	141%	\$3,052
9/19/14	SPYOMIGN	3/20/14	185	24,930	20,630	123%	818,216
9/19/14	SPY Option	8/20/14	190	30,706	45,456	1489)	\$16,547
9/19/14	SPY Option	9/20/14	195	54.216	95,158	148%	\$109,589
9/19/14	SPY Option	9/20/14	196	31,454	46,976	158%	\$93,839
9/19/14	SPY Option	9/20/14	198	65,867	98,898	150%	\$137,361
9/19/14	SPY Option SPY Option	9/20/14	200	108,946	173,778 362,319	160%	\$71,487 \$1,153,536
9/19/14	SPY Option	9/20/14	200.5	17,573	20,000	114%	575,312
9/19/14	3PY Option	12/20/14	100	78	435	558%	\$6,498
9/19/14	SPY Option	12/20/14	120	163	765	469%	813,684
9/19/14	SPY Option	12/20/14	125	203	945	466%	\$10,831
9/19/14	SPY Option	12/20/14	130	86	315	477%	84,333
9/19/14	5PY Option	12/20/14	135	240	1,080,1	450W	\$15,765
9/19/14	SPY Option	12/20/14	140	789	4,795	608%	\$60,163
9/19/14	SPY Option	12/20/14	145	437	2.216	507%	\$21,367
9/19/1/	SPY Oplion	12/20/14	150	94	450	479%	300,82
9/19/14	SPY Option SPY Option	12/20/14	155	140 4,727	630 7,084	450% 150%	\$3,052 \$33,577
9/19/14	SPY Option	12/20/14	185	7,892	11,894	151%	\$130,96T
9/19/14	SPY Option	12/20/14	170	14,969	15,017	101%	\$150,949
9/19/14	5PY Option	1/17/15	120	138	787	570%	\$11,028
9/19/14	SPY Option	1/17/15	130	90	450	503%	\$2,757
9/19/14	SPY Oolion	1/17/15	140	172	/65	445%	\$3,545
9/19/14	SPY Option	1/17/15	150	1.113	6,325	513%	\$101,814
9/19/14	SPY Option	1/17/15	155	839	5,060	603%	317,724
9/19/14	SPY Option	1/17/15	160	2,559	3.868	151%	521,660
9/19/14	SPY Option	1/17/15	165	8,733	10,856	122%	517,133
9/19/14	SPY Option SPY Option	12/19/15	100	147	675 595	4E9% 541%	\$10,339
9/19/14	SPY Option	12/19/15	115	208	1,145	550%	316,542
27.01.4							
9/19/14	SPY Option	12/19/15	120	440.	2,650	602%	\$23,041

Ex Dividend Date	Сомрану	Expiration Date	Sinks	Open Interest Balore Manipulation	One Day's Ballooned Volume	Increase in Open Interest Following Manipulative Trading	Dividend Payments to Open Interest
9/19/14	SRY Option	12/19/15	130	111	595	536%	\$3,446
9/19/14	SPY Option	12/19/15	135	337	450	134%	\$33,085
9/19/14	SPY Option	7/15/16	130	125	660	520%	\$4,733
9/19/14	SPY Option	12/16/16	110	127 399	775	519% 602%	\$12,013
9/19/14	MATERIALS SELECT SECTOR SPDR	12/16/16	120 49	2,645	2,400 3,585	138%	\$39,190 \$14,253
9/19/14	FINANCIAL SECTOR SPOR	9/20/14	22	39,706	52,161	131%	\$36,092
0/19/14	FINANCIAL SECTOR SPDR	9/20/14	23	69,755	99,052	142%	\$6,957
9/19/14	FINANCIAL SECTOR SPDR	9/20/14	23.5	22,982	41,397	(60%	\$85,763
9/19/14	FINANCIAL SECTOR SPDR	1/17/15	15	599	1,200	200%	\$6,179
9/19/14	FINANCIAL SECTOR SPDR	1/17/18	16	1,633	3,625	198%	\$11,947
9/19/14	FINANCIAL SECTOR SPDR	1/17/15	17	1,430	2.911	204%	57.484
9/19/14	INDUSTRIAL SECTOR SPDR	9/20/14	50	3,237	6,002	185%	\$2,738
9/19/14	TECHNOLOGY SECTOR SPOR	9/20/14	35	-545	550	101%	\$3,825
9/19/14	TECHNOLOGY SECTOR SPOR TECHNOLOGY SECTOR SPOR	9/20/14	37 38	5,943	9,607 3,251	101%	\$37,362 £520
9/19/14	TECHNOLOGY SECTOR SPOR	9/20/14	39	11,082	13,988	126%	\$2,265
9/19/14	TECHNOLOGY SECTOR SPOR	9/29/14	40	19,465	20,413	105%	\$6,221
9/19/14	TECHNOLOGY SECTOR SPOR	1/17/15	30	614	1,350	220%	810,139
9/19/14	CONSUMER STAPLES SPDR	9/20/14	45	5,404	7,178	133%	33,750
9/19/14	CONSUMER STAPLES SPOR	1/17/15	30	1,017	6,687	558%	\$30,510
9/19/14	CONSUMER STAPLES SPOR	1/17/15	33	9,154	64,110	700%	\$274,620
9/19/14	CONSUMER STAPLES SPOR UTILITIES SECTOR SPOR	9/20/14	38	10,360 8,160	72,510 14,794	700%	\$303,300 \$46,897
9/19/14	UTILITIES SECTOR SPOR	1/17/15	35	139	405	291%	\$1,492
9/23/14	CYPRESS SEMICONDUCTOR CORP.	1/17/18	5	298	1,000	336%	\$3,270
9/23/14	CYPRESS SEMICONDUCTOR CORP.	1/17/15	7	585	2,002	342%	\$5,808
9/23/14	IRON MOUNTAIN INC.	10/18/14	27.5	1,060	3,180	300%	\$42,513
9/23/14	IRON MOUNTAIN INC.	10/18/14	32.5	16,159	38,415	238%	\$52,155
9/23/14	Philip Morris International Inc.	10/16/14	82.6	673	2,152	320%	242,400
9/23/14	Philip Morris International Inc.	1/17/15	70	412	2,705	357%	\$18,900
9/23/14	Philip Morris International Inc. Philip Morris International Inc.	1/17/16	75. 77.5	407	2,692 2,790	539% 547%	\$29,300
9/23/14	Philip Morris International Inc.	1/15/16	65	86	516	780%	35,600
9/23/14	Philip Moma International Inc.	1/15/16	67.5	205	1,300	634%	\$9,500
9/23/14	Philip Morria International Inc.	1/15/16	70	888	7,000	709%	\$63,100
9/23/14	SEMPRA ENERGY	10/18/14	100	397	428	108%	\$7,062
9/24/14	INVESCO MORTGAGE CAPITAL INCCOM	1/17/15	15	156	550	353%	\$6,200
9/24/14	ISharas Russell 2000 ETF	9/30/14	104	204	400	196%	\$2,020
9/24/14	IShares Russell 2000 ETF IShares U.S. Real Enlate ETF	1/17/15	105	4,021 576	4,001 2,055	100% 511%	56,841 58,843
9/24/14	STAPLES INC.	10/18/14	- 11	0,127	17,679	288%	\$11,004
8/25/14	Covanta Holding Corp.	1/17/15	17.5	404	080	215%	\$2,725
9/25/14	SeaWorld Entertainment Inc	10/18/14	17.5	276	280	101%	\$1,344
9/26/14	American Capital Agency Corporation	1/17/15	15	46	325	722%	\$1,885
9/26/14	American Capital Agency Corporation	1/17/15	30	595	3,713	957%	\$27,755
9/26/14	American Capital Agency Corporation	1/15/16	18	243	1,570	846%	\$4,290
9/26/14	American Capital Agency Corporation DEERE & CO	1/16/16	70	556 174	2,035	365% 345%	\$31,850 \$5,880
9/26/14	DEERE & CO	1/15/16	60	163	550	337%	29,780
9/26/14	DOW CHEMICAL	7/77/15	25	387	2.465	637%	\$13,801
B/26/14	DOW CHEMICAL	3/17/15	30	610	4.035	653%	\$22,868
9/26/14	DOW CHEMICAL	1/17/15	32	126	600	470%	\$1,258
9/26/14	DOW CHEMICAL	1/17/15	35	158	250	168%	\$1,369
9/26/14	DOW CHEMICAL	1/17/15	40	1,573	5,455	347%	544,659
9/26/14	DOW CHEMICAL DOW CHEMICAL	1/17/15	42	2,534	5,670 1,325	224% 594%	\$4,440
9/26/14	DOW CHEMICAL	1/15/16	35	1,051	A,960	466%	\$7,859 \$38,887
9/26/14	NUCOR CORPORATION	70/16/14	49	382	850	223%	\$1,147
9/26/14	Two Harbors Investment Corporation	1/17/15	8	1,552	6,770	435%	\$40,352
9/28/14	U.S. BANCORP	70/18/14	30	374	993	268%	38,694
D/26/14	Windstream Holdings Inc.	11/22/14	a	413	850	205%	51,975
9/26/14	Windstream Holdings Inc.	11/22/14	10	2,320	2,415	104%	\$2,850
9/26/14 9/26/14	Windstream Holdings Inc. Windstream Holdings Inc.	1/17/15	9	201 525	1,200	397% 253%	\$2,475
9/26/14	Windstream Holdings Inc	1/15/16	7	867	3,475	401%	\$3,475 \$17,275
0/26/14	XEROX CORP	10/18/14	10.	549	600	109%	\$2,388
9/26/14	XEROX CORP	10/18/14	11	3,951	13,200	334%	\$19,431
9/26/14	XEROX CORP	1/17/15	5	2,516	11,000	437%	\$1,788
9/29/14	AMERICAN EAGLE OUTFITTERS	10/18/14	- 11	1,543	4,235	274%	\$750
9/29/14	AMERICAN EAGLE OUTFITTERS	10/18/14	12	3,893	10,726	278%	\$583
9/29/14	AMERICAN EAGLE OUTFITTERS	11/22/14	10	1,131	2,200	195%	3463
9/29/14	CONCAST CORPORATION CLASS COMCAST CORPORATION CLASS	1/17/15	50 35	8,105 2,563	7,040	123% 275%	\$923
9/29/14	EMC CORP	10/18/14	23	349	825	236W	11,41B 8663
9/28/14	Annaly Capital Management Inc	1/17/15	6	217	895	412%	85,790
9/29/14	Annely Capital Management Inc	1/17/15	10	2,671	12,635	473%	856,490
9/29/14	Ahnely Capital Management Inc.	1/15/16	. 0	1,502	7,000	466%	844,510
9/29/1#	Annely Capital Management Inv	1/15/16	10	5,651	22,085	391%	\$183,030
9/29/14	RAYTHEON CO	10/18/14	95	269	796	296%	53,637
9/30/14	CISCO SYSTEMS INC.	10/03/14	24.5	304 261	531 876	208% 336%	\$1,292 \$741
9/30/14	DISCO SYSTEMS INC	10/18/14	20	393	1,502	382%	\$1,102
9/30/14	DISCO SYSTEMS INC.	10/18/14	21	1,267	6,910	357%	\$5,605
9/30/14	CISCO SYSTEMS INC.	10/18/14	22	10,054	35,021	348%	\$22,990
9/30/14	CISCO SYSTEMS INC.	10/10/14	23	15,418	54,040	350%	\$16,340
9/30/14	CISOO SYSTEMS INC.	10/16/14	24	19,606	42,638	217%	\$50,597
9/30/14	CISCO SYSTEMS INC.	10/24/14	23	854	2,170	254%	\$15,200

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Ex Dividend Date		Company	Expiration Date	Strike	Coen interest Before Manipulation	One Day's Ballooned Volume	Increase in Open Interest Following Mampulative Trading	Dividend Psymants to Open Interest
9/30/14	CISCO SYSTEMS	IFIC.	1/17/15	1.0	337	1,438	426%	\$6,023
9/30/14	CISCO SYSTEMS	INC	1/17/16	13	211	920	436%	\$2,831
9/30/14	CISCO SYSTEMS	INC.	1/19/15	4.5	3,136	14,700	469%	\$42,598
9/30/14	CISCO SYSTEMS	INC	1/17/15	47	2,160	10,090	4664	\$25,650
8/30/14	CISCO SYSTEMS	INC.	1/17/15	20	10,484	30,571	349%	\$98,572
9/30/14	CISCO SYSTEMS	INC.	1/15/16	13	449	1,950	984%	\$8,037
9/30/14	CISCO SYSTEMS	INC.	1/15/10	16	3,485	16,100	465%	\$57,404